

EPA REGISTRATION NUMBER 4822-440

DP BARCODE: D286075

CASE: 007126
SUBMISSION: S622877

DATA PACKAGE RECORD
BEAN SHEET

DATE: 10/10/02
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 405 6(A)(2) ADVERSE DATA
CHEMICALS: 040500 Lavandin oil

11.4900%

ID#: 004822-00440 OFF! MOTH PROOFER 5

COMPANY: 004822 S.C. JOHNSON & SON INC.

PRODUCT MANAGER: 90 JANET ANDERSEN

703-308-8128

ROOM: CS1

5TH FL

PM TEAM REVIEWER: JIM DOWNING

703-308-9071

ROOM: CS1

RECEIVED DATE: 08/26/02

DUE OUT DATE: 11/04/02

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 286075 EXPEDITE: N DATE SENT: 10/10/02 DATE RET.: / /

CHEMICAL: 040500 Lavandin oil

DP TYPE: 001

CSF: Y

LABEL: Y

ASSIGNED TO DATE IN DATE OUT

DIV : BPPD

/ /

/ /

ADMIN DUE DATE: / /

BRAN: BPPD-IO

/ /

/ /

NEGOT DATE: 12/10/02

SECT: IO

/ /

/ /

PROJ DATE: / /

REVR :

/ /

/ /

CONTR:

/ /

/ /

* * * DATA REVIEW INSTRUCTIONS * * *

Please review this Reverse Mutation Assay to see if any changes in the registration are in order. Should the results of this study, submitted under FIFRA 6(a)(2), effect the status of this registration? Are there any labeling changes that should be made?

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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BPPD PRAT ACTION CODING FORM

P.M. 90: Janet Andersen

REGISTRANT/COMPANY NAME:

SC Johnson Company

EPA REG./FILE SYMBOL

4822-440

ACTION CODE

405

(New A.I./EUP'S/Tolerances: Yes ☐ No ☐)

DATE OF APPLICATION

8/20/02

EPA RECEIVED DATE

8/26/02

BPPD RECEIVED DATE

9/14/02

SUBMISSION BARCODE

5622877

ASSIGNED IN PRAT: Yes ☒ No ☐

COMPLETED BY

T. BETHA

DATE

10/4/02

LOGGED IN BRATS: Yes ☒ No ☐

DATE 10/8/02

COMPLETED BY

CP

RAL RECEIVED

DATE

(RAL initials)

FINAL ACTION

RESPONSE CODE:

RESPONSE DATE:

MOS:

(1) Cite All

(+) Not Applicable

(8) Selective

CRP

Restricted Use:

Manufacturing Use:

Exclusive Use:

Yes ☐

No ☐

Yes ☐

No ☐

Yes ☐

No ☐

Yes ☐

No ☐

Fast Track: Yes ☐ No ☒

Reviewer

Jim Dunning

Assigned by

9/30/02

[Note: If Fast Track, you may need to change Reviewer's Name in PRAT.]

(b)(2) submission

Note to Jim - see Bill's email to Kathleen O'Malley.

sdh
10/1/02

Bill:

I have no pending
action on this product.
Shouldn't I send this
to Oak Ridge for
review? Jim

Steve - The 692 screen
just determined that this positive
study did not indicate an immediate
threat to users and there was no
need to give it a high priority for review.
When it gets back, Roger can determine
if there is any reason to change the labeling
and/or require other studies. Bill

William Schneider

09/18/02 03:05 PM

To: Kathleen OMalley/DC/USEPA/US@EPA

cc:

Subject: Re: 6A2 BPPD Screen Request - Week of 9/13/2002

Kathleen,

I just met with Roger Gardner and Sheryl Reilly. The conclusions are that the results presented in this study are not absolutely conclusive of significant mutagenicity potential and that this does not generate immediate concern for possible label changes. It can wait to be reviewed as part of a normal submission.

William R. Schneider

Biopesticides & Pollution Prevention Division (7511C)

Kathleen OMalley

this is the only submission pending on this product

Kathleen OMalley

09/18/02 10:06 AM

To: William Schneider@EPA

cc:

Subject: 6A2 BPPD Screen Request - Week of 9/13/2002



Bill:

Please coordinate with your staff and get back to me as soon as you can! Many Thanks.

MRID #45743701 - Reverse Mutation Assay Using Bacteria Salmonella & E. Coli

RE: Off! Moth Proofer V(5)

AI: Lavandin Oil:



45743701.cs.wp< 45743701.ti

Kathleen

☒ Primary Recipient

☐ Secondary Recipient

MRID 45743701

NOTICE OF RECEIPT OF 6(a)(2) SUBMISSION

DATE: 9/11/02

FROM: Information Services Branch
Information Resources and Services Division

TO: Sheryl Reilly, BPPD

The 6(a)(2) Team has taken steps to get this screened by the appropriate science staff.

Screening determines the priority and timeframe for review.

As soon as screen results are received by ISB, you will be informed by your division 6(a)(2) Team representative. This information will determine instructions for review.

Please do not put this study or letter into review until you receive screen results and review instructions from your division 6(a)(2) Team representative.

If you have any questions, please contact Kathleen O'Malley. She is located in Room 224 CM2 and can be reached on 305-5411.

DP BARCODE: D232866

CASE: 007126
SUBMISSION: S517631

DATA PACKAGE RECORD
BEAN SHEET

DATE: 01/28/97
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 400 DATA-MISC DATA-NOT REQUES
CHEMICALS: 040500 Lavandin

11.4900%

ID#: 004822-00440 OFF! MOTH PROOFER 5

COMPANY: 004822 S.C. JOHNSON & SON INC.

PRODUCT MANAGER: 90 JANET ANDERSEN

703-308-8128 ROOM: CS1 5TH FL

PM TEAM REVIEWER: JOHN TICE

703-308-8295 ROOM: CS1 5TH FL

RECEIVED DATE: 10/09/96 DUE OUT DATE: 01/17/97

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 232866 EXPEDITE: N DATE SENT: 01/28/97 DATE RET.: / /

CHEMICAL: 040500 Lavandin

DP TYPE: 001

CSF: N

LABEL: N

ASSIGNED TO	DATE IN	DATE OUT	ADMIN DUE DATE: 05/18/97
DIV : BPPD	01/28/97	/ /	NEGOT DATE: / /
BRAN: BPPD-IO	01/28/97	/ /	PROJ DATE: / /
SECT: IO	01/28/97	/ /	
REVR : FTOGHROL	/ /	/ /	
CONTR:	/ /	/ /	

* * * DATA REVIEW INSTRUCTIONS * * *

Please review the Acute oral study and let me know if it supports the products registration.

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236
Phone: (414) 631-2000

October 7, 1996

via overnight courier

Mr. John Tice, PM 90
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk (7504C)
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Mr. Tice:

Re: OFF!® Moth Proofer 5
EPA Reg. No. 4822-440
Submission of Additional Toxicity Data

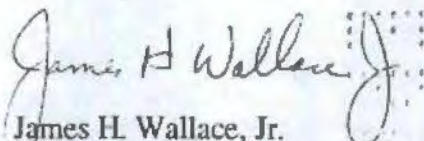
S.C. Johnson & Son, Inc. is pleased to submit the following additional data generated in support of the above captioned product, three copies of which are enclosed in compliance with PR Notice 86-5;

- Acute Oral Toxicity in Rats - Limit Test; Morris, T.D. (1996); 19 pages.
MRID Number: 44132301

Based on the results of the enclosed study, OFF!® Moth Proofer 5 is a Category IV (Acute Oral LD₅₀ > 5000 mg/kg) material with respect to acute oral toxicity. The product's EPA-accepted labeling accurately reflects this classification in its precautionary language.

Please do not hesitate to contact me by telephone at (414) 260-6881 if you have any questions or require additional information.

Best Regards,


James H. Wallace, Jr.
Registration Specialist (MS126)

Enclosures



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

OCT 11 1996

S.C. JOHNSON & SON, INC.
1525 HOWE ST.
RACINE, WI 53403

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 10/09/96. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236
Phone: (414) 631-2000

441323-00

October 7, 1996

via overnight courier

Mr. John Tice, PM 90
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk (7504C)
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Mr. Tice:

Re: OFF!® Moth Proofer 5
EPA Reg. No. 4822-440
Submission of Additional Toxicity Data

S.C. Johnson & Son, Inc. is pleased to submit the following additional data generated in support of the above captioned product, three copies of which are enclosed in compliance with PR Notice 86-5;

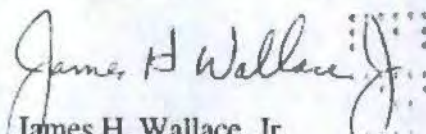
- Acute Oral Toxicity in Rats - Limit Test; Morris, T.D. (1996); 19 pages.

MRID Number: 44132301

Based on the results of the enclosed study, OFF!® Moth Proofer 5 is a Category IV (Acute Oral LD₅₀ > 5000 mg/kg) material with respect to acute oral toxicity. The product's EPA-accepted labeling accurately reflects this classification in its precautionary language.

Please do not hesitate to contact me by telephone at (414) 260-6881 if you have any questions or require additional information.

Best Regards,


James H. Wallace, Jr.
Registration Specialist (MS126)

Enclosures

PM 90

OCT 22 1996
BPPD

This is an ACCEPTED submission.

One copy of the PPC diagnosis and one copy of the annotated bibliography are provided for your files. The PPC has already mailed out the submitter's copies of the two documents.

This is a PARTIALLY ACCEPTED / COMPLETELY REJECTED submission.

A copy of the PPC diagnosis and the annotated bibliography are provided for your files. A second copy is provided for your use in corresponding with the data submitter.

DP BARCODE: D220983

CASE: 007126
SUBMISSION: S496981

DATA PACKAGE RECORD
BEAN SHEET

DATE: 11/20/95
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 194 ACTN INI BY AGCY-ADDL REQ
CHEMICALS: 040501 Essential oils

ID#: 004822-UUN OFF! MOTH PROOFER 5
COMPANY: 004822 S.C. JOHNSON & SON INC.

PRODUCT MANAGER: 90 JANET ANDERSEN

703-308-8128 ROOM: CS1 5TH FL

PM TEAM REVIEWER: JOHN TICE

703-308-8295 ROOM: CS1 5TH FL

RECEIVED DATE: 10/05/95 DUE OUT DATE: 01/23/96

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 220983 EXPEDITE: N DATE SENT: 11/20/95 DATE RET.: / /
CHEMICAL: 040501 Essential oils
DP TYPE: 001

CSF: N

LABEL: N

ASSIGNED TO	DATE IN	DATE OUT	ADMIN DUE DATE: 01/29/96
DIV : BPPD	11/20/95	/ /	NEGOT DATE: / /
BRAN: BPPD-IO	11/20/95	/ /	PROJ DATE: / /
SECT: IO	11/20/95	/ /	
REVR : FTOGHROL	11/20/95	/ /	
CONTR:	/ /	/ /	

* * * DATA REVIEW INSTRUCTIONS * * *

Please evaluate the Aspiration Hazard Evaluation and Inhalation Exposure Characteristics data attached, MRID Nos. 438068-01,-02. Include this information along with other data in your consideration for registration.

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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1565-7706-5
SCJ, 10:Am Delms
Leahre Lake MS 126

DP BARCODE: D220280

CASE: 007126
SUBMISSION: S491433

DATA PACKAGE RECORD
BEAN SHEET

DATE: 10/20/95
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 131 RESB NEW BIO-FOOD/FEED
CHEMICALS: 040501 Essential oils

ID#: 004822-UUN OFF! MOTH PROOFER 5
COMPANY: 004822 S.C. JOHNSON & SON INC.
PRODUCT MANAGER: 90 JANET ANDERSEN 703-308-8128 ROOM: CS1 5TH FL
PM TEAM REVIEWER: JOHN TICE 703-308-8295 ROOM: CS1 5TH FL
RECEIVED DATE: 07/25/95 DUE OUT DATE: 12/22/95

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 220280 EXPEDITE: Y DATE SENT: 10/20/95 DATE RET.: / /
CHEMICAL: 040501 Essential oils
DP TYPE: 001

ASSIGNED TO	CSF: Y	DATE	IN	LABEL: Y	DATE OUT	ADMIN DUE DATE: 02/02/96
DIV : BPPD		/	/		/	NEGOT DATE: / /
BRAN: BPPD-IO		/	/		/	PROJ DATE: / /
SECT: IO		/	/		/	
REVR :		/	/		/	
CONTR:		/	/		/	

* * * DATA REVIEW INSTRUCTIONS * * *

This is a new a.i. which needs 6 pack tox reviews and chemistry reviews. The file may be a bit confusing since correspondence addresses a number of products. The relevant a.i. is lavandin oil.

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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S.C. Johnson
DATA.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES, AND
TOXIC SUBSTANCES

BPPD PRAT ACTION CODING FORM

EPA REG./FILE SYMBOL 4822-UUN

ACTION CODE 130

SUBMISSION BARCODE 5491433

PM 90: Janet Andersen

REVIEWER: J Tice

Date on Application 7/20/95

EPA Received Date 7/25/95

PM Received Date 8/4/95

Assigned in PRAT YES ☒ NO ☐

Completed By: Milwina Locklear Date 8-4-95

FINAL ACTION:

Response Code _____

Response Date: / /95

MOS: _____ (1) Cite-All

_____ (4) Not Applicable

_____ (8) Selective

CRP: Yes _____ No _____

Restricted Use: Yes _____ No _____

Manufacturing Use: Yes _____ No _____

Exclusive Use: Yes _____ No _____



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 16 2003

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Jean M. Fugate
Registration Specialist
S.C. Johnson & Son, Inc.
1525 Howe St.
Racine, WI 53403-2236

Subject: EPA Registration No. 4822-440
OFF! Moth Proofer V
Your September 9, 2002 submission of FIFRA 6(a)(2) Data: Reverse Mutation
Assay Using Bacteria (MRID #457437-01)

Dear Ms. Fugate:

The data submission referred to above, submitted under FIFRA section 6(a)(2) in connection with registration of Lavandin Oil, has been reviewed. The results of that review are contained in the enclosed Secondary Review of Data Evaluation Report (DER) for the Bacterial Gene Mutation Study (MRID #457437-01) and the actual DERs.

Although the reviews do not indicate any necessity for change to the registration currently, understand that any further expansion of the uses of Lavandin Oil would require submission of the confirmatory mammalian cell test (OPPTS Test Guideline 870.5300) mentioned in the reviews.

Let me know if you have any questions regarding this matter.

Sincerely,

Dr. Sheryl K. Reilly, Chief
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (7511C)

Enclosures

SEP 10 2002

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

S.C. JOHNSON & SON, INC.
1525 HOWE STREET
RACINE, WI 53403

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 08/26/02. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

457437-00

Johnson
A FAMILY COMPANY

S. C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2636
262.260.2000

August 20, 2002

Document Processing Desk 6(a)(2)
ATTN: Mr. Norman Spurling
Office of Pesticide Programs-7504C
US Environmental Protection Agency
401 M Street SW
Washington, DC 20460

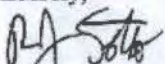
Subject: FIFRA 6(a)(2) Report of
Off! Moth Proofer V (Lavandin Oil)
EPA Registration #4822-440

Dear 6(a)(2) Coordinator:

We are resubmitting this study in 86-5 format with the changes you requested. We have added our Study Director's signature to the Statement of No Confidentiality.

If you should have any questions, please contact me at 262/260-3086.

Sincerely,



Ricardo J. Soto, Ph.D., D.A.B.T.
Manager, Product Stewardship

RJS/pls

Attachment (1)

cc: J. H. Wallace, Jr.

1- REVERSE MUTATION ASSAY USING BACTERIA
(*Salmonella typhimurium* and *E. coli*) with Lavandin Oil.

45743701



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SEP 22 1999

Dr. James H. Wallace, Jr.
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236

Dear Dr. Wallace:

Subject: Amendment Application Dated October 13, 1997/Your Revised Confidential
Statement of Formula Dated September 9, 1997
EPA Registration No. 4822-440

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(A), is acceptable provided that you submit and/or cite all data required for registration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.

Your revised Confidential Statement of Formula Dated September 9, 1997 has been included in the regulatory file.

Sincerely,

A handwritten signature in cursive script that reads "Janet L. Andersen".

Janet L. Andersen, Ph.D.
Director
Biopesticides and Pollution
Prevention Division (7511C)

DP BARCODE: D248291

Freshkeh

CASE: 007126
SUBMISSION: S532695

DATA PACKAGE RECORD
BEAN SHEET

DATE: 08/19/99
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 300 ADMN-LBL REV AMND NO DATA
CHEMICALS: 040500 Lavandin oil 11.4900%
ID#: 004822-00440 OFF! MOTH PROOFER 5
COMPANY: 004822 S.C. JOHNSON & SON INC.
PRODUCT MANAGER: 90 JANET ANDERSEN 703-308-8128 ROOM: CS1 5TH FL
PM TEAM REVIEWER: JIM DOWNING 703-308-9071 ROOM: CS1
RECEIVED DATE: 10/14/97 DUE OUT DATE: 01/12/98

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 248291 EXPEDITE: N DATE SENT: 10/13/97 DATE RET.: / /
CHEMICAL: 040500 Lavandin oil
P TYPE: 001

ASSIGNED TO	DATE IN	DATE OUT	ADMIN DUE DATE: 10/14/97
DIV : BPPD	10/13/97	/ /	NEGOT DATE: / /
BRAN: BPPD-IO	10/14/97	/ /	PROJ DATE: / /
SECT: IO	10/14/97	/ /	
REVR : FTOGHROL	08/10/98	/ /	
CONTR:	/ /	/ /	

* * * DATA REVIEW INSTRUCTIONS * * *

Please review the rational for changing the upper and lower limits and advise if the reason is adequate to approve the change.

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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*Could you v on this one and see where it is?
(This is more "clean up" from the stuff John left.)*

Thanks, Jim D.

*amendment
OK
as per
conversation
w/ Freshkeh*

BPPD PRAT ACTION CODING FORM

PM 90: Janet Andersen

REVIEWER: Jim Downing

(ASSIGNED BY: STUBBS)

EPA REG./FILE SYMBOL 4822-440

ACTION CODE 306

SUBMISSION BARCODE 5532695 amendment

Date on Application 10-13-97

EPA Received Date 10-14-97

PM Received Date 10-27-97

Assigned in PRAT YES X

NO

Completed by: S. Diana Hudson sdh

Date 11-3-97

.....

FINAL ACTION

Response Code

Response Date: / /

MOS: (1) Cite-All

 (4) Not Applicable

 (8) Selective

CRP: Yes

No

Restricted Use: Yes

No

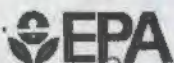
Manufacturing Use: Yes

No

Exclusive Use: Yes

No

*Diana Hudson
Please
reassign this
to Jim Downing
Thanks!
Sheel*



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

233778

Application for Pesticide - Section I

1. Company/Product Number 4822-440	2. EPA Product Manager TICE	3. Proposed Classification <input type="checkbox"/> Not Restricted <input type="checkbox"/> Restricted
4. Company/Product (Name) OFF! Mothproofer 5	PM# BPPD 91	
5. Name and Address of Applicant (Include ZIP Code) S. C. Johnson & Son, Inc. 1525 Howe Street Racine, WI 53403-2236 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(a)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Registrant requests acceptance of a revised confidential statement of formula depicting applicant-proposed certified limits for the active ingredient.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
Certification must be submitted If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name James H. Wallace, Jr.		Title Registration Specialist		Telephone No. (Include Area Code) 414/260-6881	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature <i>James H. Wallace Jr.</i>		3. Title Registration Specialist			
4. Typed Name James H. Wallace, Jr.		5. Date October 13, 1997			

PAPERWORK REDUCTION ACT NOTICE and INSTRUCTIONS

PAPERWORK REDUCTION ACT NOTICE: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

INSTRUCTIONS: This form is to be used for all applications for new registration, and use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). (If not exempted by 40 CFR 152.81 (b) (4));
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper for submission or a mockup of the proposed label. If prepared for mockup, it should be constructed in a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registrations that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size(s) of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** - Indicate the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

- 1-5. Self-explanatory.
6. EPA Use Only.



S. C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236
Phone: (414) 260-2000

October 13, 1997

via overnight courier

Mr. John Tice, Regulatory Action Leader
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk (7504C)
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Mr. Tice:

Re: OFF! Moth Proofer 5
EPA Reg. No. 4822-440
Application for Amendment

S.C. Johnson & Son, Inc. (SCJ) is seeking acceptance of the enclosed Application for Pesticide Amendment for OFF! Moth Proofer 5 (EPA Reg. No. 4822-440). Specifically, SCJ wishes to amend its registration by expanding the certified limits for the active ingredient, Lavandin Oil, to N +/- 10%N.

The current Confidential Statement of Formula (CSF) for OFF! Moth Proofer 5 depicts standard certified limits of N +/- 5%N for Lavandin Oil. However, after a full season of production, we have determined that limits of N +/- 10%N would be more appropriate for this product. This determination is based on variability of the active ingredient concentration in the source product and variability encountered during gas chromatographic analyses of the finished product.

As depicted on our CSF, the active ingredient in OFF! Moth Proofer 5 is sourced from [REDACTED] [REDACTED] has advised that the source material may contain Lavandin Oil at concentrations ranging from [REDACTED]. This is equivalent to [REDACTED]. Given that the current certified limits for the finished product are also N +/- 5%N, there is no allowance left to account for variability in manufacturing, analyses or storage stability.

We have learned that the analytical method submitted in support of registration may be difficult for some contract laboratories to duplicate with the same level of precision achieved by SCJ scientists during development of the product. One contract laboratory has encountered analytical variability of up to 7% over the past several months. We have determined that this variability can likely be attributed to operator error and differences in the analytical equipment (specifically the data integrators) between the laboratories. We are currently working with our contract laboratory to resolve this issue. Great progress has already been made, and we remain confident that these efforts will succeed.

Product ingredient source information may be entitled to confidential treatment

Wallace to Tice
October 13, 1997
Page 2 of 2

Although there will always be some variability encountered in any manufacturing operation, it is important to note that there is very little variability encountered in the production of OFF! Moth Proofer. The product is formulated by simple stepwise addition of ingredients. The finished product contains approximately 95% active ingredient source material. Given that there are only [REDACTED] additional ingredients in the formula, and one of them is a dye present at a very low level, it is obvious that the manufacturing process itself contributes very little to the overall variability encountered with the active ingredient.

We have tested the performance of OFF! Moth Proofer 5 with concentrations of Lavandin Oil as low as 10%. Our testing showed that 10% Lavandin Oil samples provided control of clothes moths equally as well as 11.5% samples. We are proposing a lower certified limit of 10.34% for Lavandin Oil. Our data show that this would not compromise product performance.

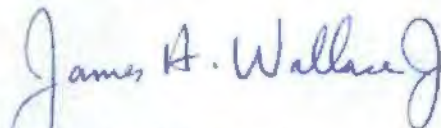
The toxicity profile of Lavandin Oil shows very little mammalian toxicity. Additionally, due to the unique nature of the OFF! Moth Proofer delivery system, there is little exposure to humans from use of the product. Therefore, raising the upper certified limit for Lavandin Oil from 12.07% to 12.64% would present no additional health risk to consumers.

For these reasons, we believe that our request for approval of revised certified limits for Lavandin Oil in OFF! Moth Proofer 5 is appropriate. We have enclosed the following materials in conjunction with our request:

- Application for Pesticide Amendment, OPP ID # 233777;
- Confidential Statement of Formula dated September 11, 1997.

We appreciate your attention to this matter, and look forward to your favorable reply. Meanwhile, please do not hesitate to contact me by telephone at (414) 260-6881 if you have any questions or need additional information.

Best Regards,



James H. Wallace, Jr.
Registration Specialist
Mail Station 126
email: jhwallac@scj.com

Enclosures (2)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

10/21/97

JAMES H. WALLACE, JR.
S.C. JOHNSON & SON INC.
1525 HOWE STREET
RACINE WI 53403

PRODUCT NAME: OFF! MOTHPROOFER 5
COMPANY NAME: S.C. JOHNSON & SON INC.
OPP IDENTIFICATION NUMBER: 233778
EPA REGISTRATION NUMBER: 4822-440
EPA RECEIPT DATE: 10/14/97

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application qualifies for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability.

If you have any questions, please contact Roy Sjoblad, Product Manager 91, at (703) 308-8269.

Sincerely,

J. Wallace

Front End Processing Staff
Information Services Branch
Program Management and Support Division

10-21-97
RPP# 233778

FRONT END PROCESSING APPLICATION INFORMATION CHECK

RECEIVED
10/27/97
BRPD

PM 91

EPA COMPANY NUMBER 4822-440

EPA REGISTRATION NUMBER
STATUS (FOR AMENDMENTS)

Active ☒ Cancelled ☐

Not in REFS ☐

"ME-TOO" CITED PRODUCT STATUS Active ☐ Cancelled ☐

Not in REFS ☐

PRAT RECORD CREATED ☐

AMENDMENT

App # 233778

APPLICATION FOR AMENDMENT

WITH DATA

NO DATA

INIT. DATE

INIT DATE

FEU _____

FEU *Jan 10-21-97*

SIG (DATA) _____

PM *91*

PM _____

260-3077

S.C. Johnson & Son, Inc.

Racine, Wisconsin U.S.A. 53403-2236

Worldwide Consumer Products
Research, Development & Engineering

FACSIMILE TRANSMISSION SHEET

TO: ATTENTION: John Tice
COMPANY: EPA OPP
FACSIMILE PHONE NO: (703) 308-7026

NUMBER OF PAGES: 3
(includes Transmission Sheet)

The information contained in this communication is confidential, and intended only for the use of the addressee. Unauthorized use, disclosure or copying is strictly prohibited. If you have received this communication in error, please immediately notify us, collect, at the contact number below, so that we can arrange for retrieval of the original document at our cost. Thank you.

FROM: Maren E. Grow
Regulatory Compliance Dept.

DATE: 8-19-96

MESSAGE:

Following is our draft final printed label (enlarged for purposes of clarity of the FAX) for OFFI Moth Proofer, EPA Reg. # 4822-440. Per our phone conversation today, we would like your confirmation that the referral statements that we chose (indicated by arrows on the art) do meet the intent of your referral statement comment in #3 of the EPA cover letter Notice of Pesticide Registration dated 8-12-96 which reads "A referral statement ("see [box] for detailed instructions)".

Please reply to me by FAX (414-260-3077) with your acceptance, or if you do not agree please advise us as to how we can change them to meet the intent of your comment. Thank you in advance for agreeing to handle this for us.

-Maren

If there are problems with this transmission, please phone (414)260-4722 or FAX (414)260-3077.

cc: Chris (007), Ric, Geri, Leslie (126), Jim (126)

Leslie Lake,

NEW  **Johnson
Wax**

OFF!

**Moth
Proofer**

**PLEASANT PROTECTION
FOR YOUR CLOTHES**



**Lasts up to
one season**

CAUTION: KEEP OUT OF REACH OF CHILDREN
SEE ADDITIONAL PRECAUTIONARY STATEMENTS ON BACK

ACTIVE INGREDIENT:
LAVENDER OIL 11.45%
INERT INGREDIENTS: ... 88.55%

CONTAINS 2 UNITS

NET CONTENTS: 11 OZ. PER UNIT NET WT. 22 OZ.

OFF!

Moth Proofer

CAUTION: KEEP OUT OF REACH OF CHILDREN
SEE ADDITIONAL PRECAUTIONARY STATEMENTS BELOW BEFORE USE

ACTIVE INGREDIENT:
Lycabac 00 11.49%
INERT INGREDIENTS: ... 88.51%

STORAGE: Store in a cool area away from children.
DISPOSAL: Wrap and put in trash collection.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. Separate the two units. Remove cardboard backing from unit using pull tab. Slowly remove foil label from the cartridge using scissors. Do not remove or puncture clear air protecting colored gel. This film controls the release of concentrated protection ingredients.



2. This product can be placed inside drawers and storage boxes or hung in closets. Use one unit in smaller closets, drawers or boxes, two in larger closets, drawers, or boxes.

Important: For maximum effectiveness, closets, drawers or boxes must be kept as airtight as possible. Dry clean garments before storing.



3. When the gel dries and turns to powder, this signals replacement time. Replace all units every three months. Replace stored units every season.



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT: IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

PULL TAB

EPA Reg. No. 4822-440 EPA Est. No. 038534-IL-002

STORAGE: Store in a cool area away from children.
DISPOSAL: Wrap and put in trash collection.



This product can be placed inside drawers, storage boxes or hung in closets.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT: IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

NET WT. 11 OZ



411798

PULL TAB

EPA Reg. No. 4822-440 EPA Est. No. 038534-IL-002



United States
Environmental Protection Agency
Washington, DC 20480

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

216924

Application for Pesticide - Section I

1. Company/Product Number 4822-440	2. EPA Product Manager Tice	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) OFF! Moth Proofer 5	PM# BPPD	
5. Name and Address of Applicant (Include ZIP Code) S. C. Johnson & Son, Inc. 1525 Howe St. Racine, WI 53403-2236 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	NOTIFICATION AUG 22 1997
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.) Notification of Minor label revision per PR Notice 95-2. Registrant hereby notifies the agency of the addition of an arrow diagram demonstrating how to open the product container.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name James H. Wallace Jr.		Title Registration Specialist		Telephone No. (Include Area Code) 414/260-6881	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					8. Date Application Received (Stamped) 34
2. Signature 		3. Title Registration Specialist			
4. Typed Name James H. Wallace Jr.		5. Date 7/23/97			

PAPERWORK REDUCTION ACT NOTICE and INSTRUCTIONS

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SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended registration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
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1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; general label revision of use directions." Attach a separate page if additional space is needed.

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SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

1. Self-explanatory.
2. EPA Use Only.

78/82/17



659862.-20.376" X 42.5"
LAYOUT 8858.-MAC/PAKS-REVERSE
REWIND:#2, 02/26/97, PLANT 552
L.BLACK/STD-79882A

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AUG 22 1997

NOTIFICATION



S. C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236
Phone: (414) 260-2000

23 July, 1997

via overnight courier

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7505W)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202
ATTN: Ms. Sherada Hobgood or Mr. Owen Breder

Dear Madam/Sir:

Re: OFF! Moth Proofer 5
EPA Reg. No. 4822-440
NOTIFICATION OF MINOR LABEL REVISION

S.C. Johnson & Son, Inc. hereby notifies the U.S. Environmental Protection Agency of its intention to distribute and sell the subject pesticide product utilizing the attached revised labeling.

The revised label consists of an arrow diagram appearing on the foil seal that covers the permeable membrane attached to the product container. The product is opened and activated upon removal of the seal. After several months of use history, we have determined that by revising the label to include an arrow diagram, we will be able to provide consumers with a better understanding of how to open the product.

We have enclosed a fully executed Application for Pesticide Registration form, OPP ID # 216924 to facilitate this change.

This notification is consistent with the provisions of PR Notice 95-2 and EPA regulations set forth at 40 CFR §152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR §152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

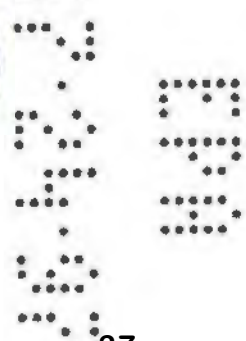
I can be reached by telephone at (414) 260-6881 if you have any questions or require further information regarding this notification. Thank you for your attention to this matter.

Best Regards,
S.C. JOHNSON & SON, INC.

James H. Wallace, Jr.

James H. Wallace, Jr.
Registration Specialist
Email: jhwallac@scj.com

Enclosure



DP BARCODE: D248295

CASE: 007126
SUBMISSION: S546963

DATA PACKAGE RECORD
BEAN SHEET

DATE: 08/19/99
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 400 DATA-MISC DATA-NOT REQUES
CHEMICALS: 040500 Lavandin oil

11.4900%

ID#: 004822-00440 OFF! MOTH PROOFER 5
COMPANY: 004822 S.C. JOHNSON & SON INC.
PRODUCT MANAGER: 90 JANET ANDERSEN
PM TEAM REVIEWER: JOHN TICE
RECEIVED DATE: 07/08/97 DUE OUT DATE: 11/05/97

703-308-8128 ROOM: CS1 5TH FL
703-308-8295 ROOM: CS1 5TH FL

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 248295 EXPEDITE: N DATE SENT: 07/03/97 DATE RET.: 12/07/98
CHEMICAL: 040500 Lavandin oil
DP TYPE: 001

	CSF: N		LABEL: N	
ASSIGNED TO	DATE	IN	DATE	OUT
DIV : BPPD	/	/	/	/
BRAN: BPPD-IO	/	/	/	/
SECT: IO	/	/	/	/
REVR :	/	/	/	/
CONTR:	/	/	/	/

ADMIN DUE DATE: 07/08/97
NEGOT DATE: / /
PROJ DATE: / /

* * * DATA REVIEW INSTRUCTIONS * * *

✓ Does this change affect our risk assessment? Do we have
to change any information on the label?

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
-------	----------------	----------	----------	-----	-----	-------

How about this? Has it been done?

*This has not been done, but does not change
anything. P.N. That this label has been
audited, and problem is that the people
used for the project were not told this
is for the registration of this product. Please
talk to Jane Smith about the Fresh Tech
label audit.*

CONVERSATION RECORD

9/21/99 Date 11:21 Time am pm
Type: ☒ Personal Contact ☒ Phone

Name: Jim Downing Org. BPPD Phone: 308-9071
Subject: Revised Psilman Dermatitis Study

Summary: I talked with Feshteh Toghrul, who confirmed the fact that this revised report did not change anything concerning the registration.

The changes from the original study report (MRID 437653-02) were not major and do not effect the scientific integrity of the report or its conclusions. No action required.

Name of Person Documenting Conversation: Jim Downing
Signature: Jim Downing Date: 9-21-99

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

JUL 09 1997

S.C. JOHNSON & SON, INC.
1525 HOWE ST.
RACINE, WI 53403

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 07/08/97. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236
Phone: (414) 631-2000

443159-00

July 3, 1997

via overnight courier

Mr. John Tice, Regulatory Action Leader
U. S. Environmental Protection Agency
Office of Pesticide Programs
Biopesticides and Pollution Prevention Division
Document Processing Desk (7504C)
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Re: OFF! Moth Proofer 5
EPA Registration Number 4822-440
OFF Mothproofer #5, 14490P21 Primary Dermal Irritation Study in
Humans -- MRID No. 437653-02

Dear Mr. Tice:

Enclosed herewith is a revised report for the above-referenced study. The revisions have been made to address concerns expressed by EPA auditors at an inspection of Harrison Research Laboratories ("HRL") and to make improvements indicated by a S.C. Johnson & Son, Inc. (Johnson) audit of the report.

The revisions in the report are all relatively minor and do not affect the scientific integrity of the report and its conclusions, other than a favorable change resulting from the revised scoring method.

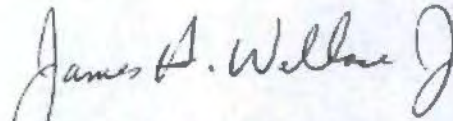
The revisions fall into two categories: those made by HRL and those made by Johnson. After the EPA audit, HRL made several revisions to the report. These were made unilaterally, without consulting Johnson. Johnson later conducted a Quality Assurance review of the study and determined that further revisions were desirable. After HRL refused to comply with Johnson's instructions to make these revisions, Johnson removed the study from HRL and made the additional revisions. In a telephone conversation between our Jillaine Griesemer (GLP QAU Supervisor) and EPA's Francisca Liem, Ms. Liem indicated that it would be acceptable for Johnson to proceed in this manner and submit the revised report.

Wallace to Tice
July 3, 1997
Page 2 of 2

The HRL revisions are identified and numbered in the enclosed report ("HRL 1," "HRL 2," etc.), as are the Johnson revisions ("SCJ 1," "SCJ 2," etc.) and comments ("SCJ C 1," "SCJ C 2," etc.). A summary of the revisions is also provided. On the report itself, the HRL revisions are incorporated in the text, while the Johnson changes are shown as deletions/additions to the text.

We trust the revised report will provide a better record of the study for EPA's files, and we believe it fully addresses the concerns raised by EPA in the inspection. Please let me know if you have any questions.

Best Regards,

A handwritten signature in cursive script that reads "James H. Wallace, Jr." with a large, stylized "J" at the end.

James H. Wallace, Jr.
Registration Specialist

Enclosures: Revised study (3 copies)
Summary of study revisions

Study Title: Off! Mothproofers #5, 14490P21 Primary Dermal Irritation Study in Humans 44315901

Product: OFF! Mothproofers 5

Active Ingrid.: Lavandin Oil (Chemical Number 81000)

EPA Reg. No.: 4822-440

MRID No.: 437653-02

Following is a summary of the changes which HRL made in the revised report.

- HRL 1. The revised report contains the words "Revised Final Report - March 25, 1997" on the top of all of the pages and "Revised Final Report" in addition on page 4. (pages 1 and 4)
- HRL 2. The "study completed on" date was changed from June 12, 1995 to June 2, 1995. The original report was signed by the Principal Investigator on June 12, 1995 but the testing was completed on June 2, 1995. It is unclear as to why this change was made. (page 1)
- HRL 3. The statement, "However, the internal HRL SOP is an adaptation of GCLP as appropriate to Human Clinical Studies" was removed from the original report. It is unclear as to why this was changed. (page 3)
- HRL 4. The scoring criteria were changed in the revised report. The differences are indicated below in bold type. It is unknown as to why HRL made the changes, however, they may have been made to comply with their internal standard operating procedures. (page 6)

Original Report

SCORING CRITERIA

NO. OF SUBJECTS	REACTION	CONCLUSION
0		no dermal irritation
1-3	±/1-level	negligible dermal irritation potential
4 or more	1-level	minimal dermal irritation potential
1 or more	2-level	comment

Revised Report

SCORING CRITERIA

NO. OF SUBJECTS	REACTION	CONCLUSION
All	0	no dermal irritation
Any	±-level	not relevant for irritation
1-3	1-level	negligible dermal irritation potential
4 or more	1-level	minimal dermal irritation potential
1 or more	edematous or 2-level	comment

- HRL 5. The revised report was re-signed and re-dated at the time of revision by individuals at HRL including Joan McBride, Project Manager; Lynne B. Harrison, Principal Investigator; and Sonia Mills, Clinic Manager. (pages 7 and 10)

Following is a summary of the changes which SCJ made to HRL's revised report.

- SCJ 1. The laboratory project identification was incorrectly stated in both the original and revised report. SCJ changed the information to correctly state the project identification. (page 1)
- SCJ 2. The Sponsor Representative listed in the original and revised reports is no longer employed at SCJ. It is for this reason the Sponsor Representative was changed by SCJ. (pages 1 and 3)
- SCJ 3. The revised report was signed by the company's current agent. The company's agent who signed the original report was replaced. (page 2)
- SCJ 4. SCJ's Regulatory Affairs submitter listed on page 3 was changed. The current submitter signed the revised compliance statement. (page 3)
- SCJ 5. The following statement should be inserted. "This study was conducted concomitantly with three other similar studies. Three or four products were applied to each panelist during the course of the study. This is customary for this type of testing. Adequate precautions were taken to prevent cross-contamination and cross-reactivity between products."
- SCJ 6. In both the original and final reports, the following statement is made in the "Results" section, "A complete set of individual Data Forms is included herewith; these Case Report Forms are an integral part of this Final Report." This statement has been struck out by SCJ in the revised report because the data forms were not included by HRL in either the original or final reports (i.e. the forms were not bound to the final report and the pages were not numbered). The data forms are not suitable (i.e. carbon copies, not numbered) for inclusion in the report according to PR Notice 86-5. The data provided to SCJ is adequately and thoroughly summarized in the final report and there is no obvious reason for including the data sheets in the report. (page 6)
- SCJ 7. Based on the revised scoring criteria (refer to HRL point 4), the conclusion in both the original and revised report is incorrect. It is for this reason SCJ replaced the words, "exhibited negligible dermal irritation potential" with "is not relevant for irritation". This is a lower irritation conclusion than the original classification. (page 6)

Following is additional, relevant information concerning this study. This information does not appear to affect the quality or integrity of the study.

- SCJ C 1. It is unclear whether the instructions for handling the test material were written and provided to HRL by SCJ as indicated in both the original and revised final report. It is quite possible these instructions were provided verbally or were provided generally for products of the nature being tested. SCJ did not have any issues concerning material handling at the time of testing. (page 4)
- SCJ C 2. Although the scoring time was recorded for subjects 7-26, there are no records of how many hours elapsed between patching and scoring for all subjects, since the initial patching times were not recorded. HRL was requested to verify this in writing but refused since it was not requested specifically by the EPA.

SCJ C 3. Patching of subjects was conducted in the scapular region of the back as well as the lumbar region. The protocol describing this type of testing states that only the lumbar region will be used. Likewise, patches were not applied in the sequence stated in the protocol. Although neither of these items have any apparent study impact, it is important to note differences between study conduct and what is specified in the protocol. No explanation was provided by HRL for these discrepancies for the same reason stated above.

SCJ C 4. Subject selection criteria was not included in the final report as required by the protocol. Although this does not appear to have a negative impact on the study, it is a discrepancy between the protocol and final report. No explanation was provided by HRL.

SCJ C 5 Other minor discrepancies and questions were also noted with no explanation provided by HRL.

- It appears that protocol 375 and 375-8 are the same protocol, however, this could not be verified without the help of HRL. The Quality Assurance Memorandum refers to "HRL Standard Protocol 375-8 (including any Sponsor alterations)". The SCJ audit of this report was conducted with the protocol titled, "HRL Standard Protocol #375/Primary Dermal Irritation Test (PDI)".
- Although authorization to conduct the study was granted in writing, it is unclear whether all of the related requirements, as stated in HRL protocols and SOPs, were met. It is unclear if changes to original written correspondence were properly documented and authorized. Despite these questions, the study was conducted as desired by the Sponsor Representative.
- The method of recording the volatilization times of the test material while on the patches and of ensuring the correct time had elapsed prior to patch application is unclear. The protocol requires the documentation of the time of application of the test material to the patches for the first and last patch on a tray for material which must volatilize prior to application.
- No test score times were recorded on the data sheets as required by the protocol for subjects 1-6.
- Two slightly different scoring systems are described in or referenced by the protocol. One system is to be used with a specific type of form (Data M), however, the system was also used on forms in addition to Form: Data M.
- The protocol refers to specific criteria for subject selection. However, the report does not indicate the stated criteria were used.
- On page 5, it appears that "vesiculation erosion" should actually be "vesiculation/erosion".
- On page 5 in the second paragraph under results, the following change was made by HRL in the revised report, "the subject did not discontinued ..." to "the subject did not discontinue ...".
- The initials of the subjects listed in Table 1, page 9 of the final report could not be verified since they were not listed on the data sheets.
- There are occasional writeovers in the start date or the reading date. These were not handled according to the GLP regulation.



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

4822 - ~~440~~.
440

VIA FEDERAL EXPRESS

August 22, 1995

AMENDMENT

Mr. Phil Hutton
Product Manager 90
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attn: John Tice

Dear Mr. Hutton

Re: OFF! Moth Proofer 5
EPA Reg. File Symbol 4822-UUN

Enclosed please find an application for Pesticide Amendment and 5 copies of the revised label.

This revised label reflects updated precautionary statements based on new test data that was submitted to EPA on July 20, 1995.

Based on our new test data results this product is not a skin irritant and the LD 50 of 70% of the formulation is > 5 g/kg.

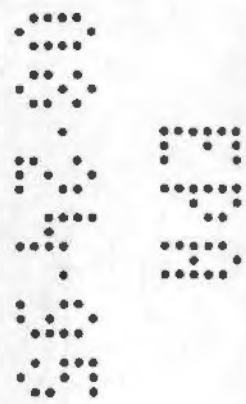
If you have any questions concerning this submission please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist

Enclosures





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

246859

Application for Pesticide - Section I

1. Company/Product Number 4822-UUN	2. EPA Product Manager Hutton	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) OFF! Moth Proofer 5	PM# 90	
5. Name and Address of Applicant (Include ZIP Code) S. C. Johnson & Son, Inc. 1525 Howe Street Racine, WI 53403 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Revised labeling to reflect updated precautionary statements based on new test data.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Geri L. Vander Leest	Title Registration Specialist	Telephone No. (Include Area Code) (414) 621-3553	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature <i>Geri L. Vander Leest</i>	3. Title Registration Specialist		47
4. Typed Name Geri L. Vander Leest	5. Date 08/22/95		

FRONT PANEL

OFF! Moth Proofer 5

New

(Fresh) (Pleasant) Lavender Scent

Outdoor Fresh Scent

Spring Fresh Scent

Spring Breeze Scent

(Pleasant) (Fresh) Scent

(Country) Fresh Scent

Soft Sachet Scent

Floral Bouquet Scent

Sunshine (Fresh) Scent

(Pleasant) (Country) Spice Scent

(Fresh) Herbal Scent

(Effectively) controls moth problems with a pleasant scent

No unpleasant mothball smell

No harsh chemicals

No need to dry clean (or) (air out your) clothes (garments) after storage (use)

Protects clothes from moth damage

Keeps moths off clothes

Effective for one season

Lavender Formula

Protects clothes from (moth) damage for one (two) (three) (four) months (season long) (for one season)

Freshens closets (drawers) while protecting clothes from (moth) damage

Repels (kills) (controls) (moths) (moth eggs and larvae) (pupae) (which cause damage to clothes)

Easy to use

No mess

Convenient to use

Unique (clothes) (garment) protection (with a pleasant scent)

Not only protects (your) clothes, it freshens (your) closet (drawers)

Protects (your) clothes from moths (damage) with a (natural), fresh (pleasant) (lavender) scent

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Contains (number) (name) (hangers) (units) (fresheners)

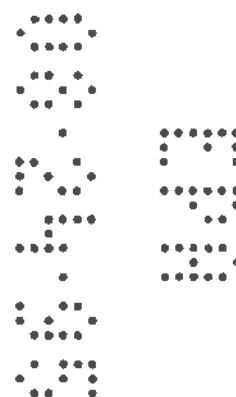
Net Contents: contains 2 units

net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back



OFF! Moth Proofer 5

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT: IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

Questions? Comments? Call 800-558-5252 weekdays, 9-9 Eastern Time or Write Helen Johnson
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EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

Unit Labeling

OFF! Moth Proofer 5

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Net Contents .11 oz. per unit

Keep Out Of Reach Of Children

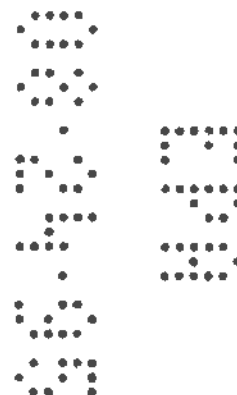
CAUTION

See outer package for additional precautionary statements and complete directions

EPA Reg. No. 4822-

EPA Est. No. 4822-WI-1

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BACK PANEL

OFF! Moth Proofer 5

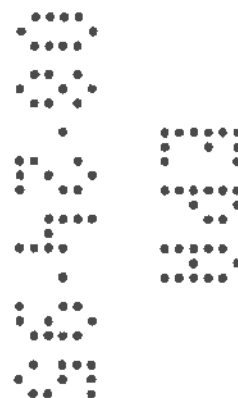
DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. (Separate the two units.) Slowly remove foil label from the (fragrance) cartridge using peel tab. Do not remove or puncture white (clear) film protecting (colored) (fragrance) concentrate (gel). This film controls the release of concentrated (freshening) (protection) ingredients. (Insert cartridge into holder unit.)
2. This product can be placed inside drawers and storage boxes or hung in closets. Use one unit in smaller (average size) closets, drawers or boxes, two in larger closets, drawers or boxes (and close tightly). **Important:** For maximum effectiveness, closets, drawers or boxes must be kept as air tight as possible. Dry clean clothes (garments) (fabrics) before storing (Clean clothes (garments) (fabrics) before storing).
3. When the (fragrance) concentrate (gel) dries and cracks (turns to powder), this signals replacement time (for the cartridge). (Replace all (name) (units) every (one) (two) (three) (four) months (season)).

STORAGE: Store in a cool area away from children.

DISPOSAL: Wrap and put in trash collection.



FRONT PANEL

OFF! Moth Proofer 5

New

(Fresh) (Pleasant) Lavender Scent

Outdoor Fresh Scent

Spring Fresh Scent

Spring Breeze Scent

(Pleasant) (Fresh) Scent

(Country) Fresh Scent

Soft Sachet Scent

Floral Bouquet Scent

Sunshine (Fresh) Scent

(Pleasant) (Country) Spice Scent

(Fresh) Herbal Scent

(Effectively) controls moth problems with a pleasant scent

No unpleasant mothball smell

No harsh chemicals

No need to dry clean (or) (air out your) clothes (garments) after storage (use)

Protects clothes from moth damage

Keeps moths off clothes

Effective for one season

Lavender Formula

Protects clothes from (moth) damage for one (two) (three) (four) months (season long) (for one season)

Freshens closets (drawers) while protecting clothes from (moth) damage

Repels (kills) (controls) (moths) (moth eggs and larvae) (pupae) (which cause damage to clothes)

Easy to use

No mess

Convenient to use

Unique (clothes) (garment) protection (with a pleasant scent)

Not only protects (your) clothes, it freshens (your) closet (drawers)

Protects (your) clothes from moths (damage) with a (natural), fresh (pleasant) (lavender) scent

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Contains (number) (name) (hangers) (units) (fresheners)

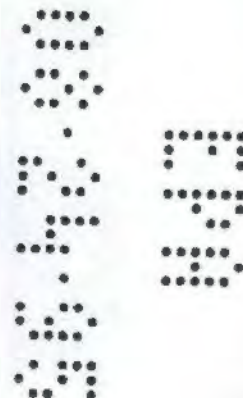
Net Contents: contains 2 units

net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back



BACK PANEL

OFF! Moth Proofer 5

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. (Separate the two units.) Slowly remove foil label from the (fragrance) cartridge using peel tab. Do not remove or puncture white (clear) film protecting (colored) (fragrance) concentrate (gel). This film controls the release of concentrated (freshening) (protection) ingredients. (Insert cartridge into holder unit.)
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STORAGE: Store in a cool area away from children.

DISPOSAL: Wrap and put in trash collection.



OFF! Moth Proofer 5

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid contact with skin or eyes. Wash hands thoroughly after handling.

STATEMENT OF PRACTICAL TREATMENT: IF SWALLOWED, DO NOT INDUCE VOMITING. Contact a physician or poison control center. Vomiting may cause aspiration pneumonitis. IF ON SKIN: remove with soap and water. If irritation persists, seek medical attention. IF IN EYES: flush eyes with plenty of water. If irritation persists, seek medical attention.

Questions? Comments? Call 800-558-5252 weekdays, 9-9 Eastern Time or Write Helen Johnson
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EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

Unit Labeling

OFF! Moth Proofer 5

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Net Contents .11 oz. per unit

Keep Out Of Reach Of Children

CAUTION

See outer package for additional precautionary statements and complete directions

EPA Reg. No. 4822-

EPA Est. No. 4822-WI-1

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FRONT PANEL

OFF! Moth Proofer 5

New

(Fresh) (Pleasant) Lavender Scent

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(Pleasant) (Fresh) Scent

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Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Contains (number) (name) (hangers) (units) (fresheners)

Net Contents: contains 2 units

net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back

BACK PANEL

OFF! Moth Proofer 5

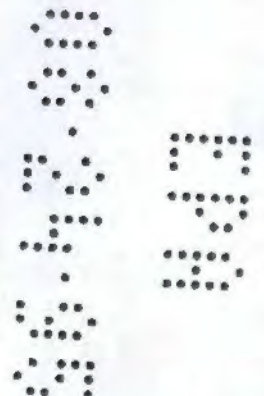
DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. (Separate the two units.) Slowly remove foil label from the (fragrance) cartridge using peel tab. Do not remove or puncture white (clear) film protecting (colored) (fragrance) concentrate (gel). This film controls the release of concentrated (freshening) (protection) ingredients. (Insert cartridge into holder unit.)
2. This product can be placed inside drawers and storage boxes or hung in closets. Use one unit in smaller (average size) closets, drawers or boxes, two in larger closets, drawers or boxes (and close tightly). **Important:** For maximum effectiveness, closets, drawers or boxes must be kept as air tight as possible. Dry clean clothes (garments) (fabrics) before storing (Clean clothes (garments) (fabrics) before storing).
3. When the (fragrance) concentrate (gel) dries and cracks (turns to powder), this signals replacement time (for the cartridge). (Replace all (name) (units) every (one) (two) (three) (four) months (season)).

STORAGE: Store in a cool area away from children.

DISPOSAL: Wrap and put in trash collection.



OFF! Moth Proofer 5

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid contact with skin or eyes. Wash hands thoroughly after handling.

STATEMENT OF PRACTICAL TREATMENT: IF SWALLOWED, DO NOT INDUCE VOMITING. Contact a physician or poison control center. Vomiting may cause aspiration pneumonitis. IF ON SKIN: remove with soap and water. If irritation persists, seek medical attention. IF IN EYES: flush eyes with plenty of water. If irritation persists, seek medical attention.

Questions? Comments? Call 800-558-5252 weekdays, 9-9 Eastern Time or Write Helen Johnson
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EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

Unit Labeling

OFF! Moth Proofer 5

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Net Contents .11 oz. per unit

Keep Out Of Reach Of Children

CAUTION

See outer package for additional precautionary statements and complete directions

EPA Reg. No. 4822-

EPA Est. No. 4822-WI-1

S. C. Johnson & Son, Inc. Racine, WI 53403-2236 All rights reserved.

FRONT PANEL

OFF! Moth Proofer 5

New

(Fresh) (Pleasant) Lavender Scent

Outdoor Fresh Scent

Spring Fresh Scent

Spring Breeze Scent

(Pleasant) (Fresh) Scent

(Country) Fresh Scent

Soft Sachet Scent

Floral Bouquet Scent

Sunshine (Fresh) Scent

(Pleasant) (Country) Spice Scent

(Fresh) Herbal Scent

(Effectively) controls moth problems with a pleasant scent

No unpleasant mothball smell

No harsh chemicals

No need to dry clean (or) (air out your) clothes (garments) after storage (use)

Protects clothes from moth damage

Keeps moths off clothes

Effective for one season

Lavender Formula

Protects clothes from (moth) damage for one (two) (three) (four) months (season long) (for one season)

Freshens closets (drawers) while protecting clothes from (moth) damage

Repels (kills) (controls) (moths) (moth eggs and larvae) (pupae) (which cause damage to clothes)

Easy to use

No mess

Convenient to use

Unique (clothes) (garment) protection (with a pleasant scent)

Not only protects (your) clothes, it freshens (your) closet (drawers)

Protects (your) clothes from moths (damage) with a (natural), fresh (pleasant) (lavender) scent

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Contains (number) (name) (hangers) (units) (fresheners)

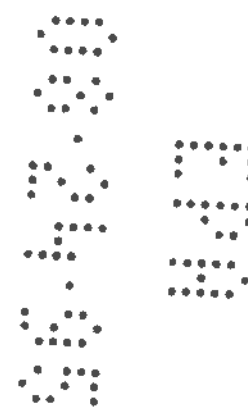
Net Contents: contains 2 units

net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back



BACK PANEL

OFF! Moth Proofer 5

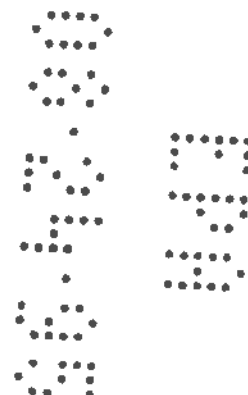
DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. (Separate the two units.) Slowly remove foil label from the (fragrance) cartridge using peel tab. Do not remove or puncture white (clear) film protecting (colored) (fragrance) concentrate (gel). This film controls the release of concentrated (freshening) (protection) ingredients. (Insert cartridge into holder unit.)
2. This product can be placed inside drawers and storage boxes or hung in closets. Use one unit in smaller (average size) closets, drawers or boxes, two in larger closets, drawers or boxes (and close tightly). **Important:** For maximum effectiveness, closets, drawers or boxes must be kept as air tight as possible. Dry clean clothes (garments) (fabrics) before storing (Clean clothes (garments) (fabrics) before storing).
3. When the (fragrance) concentrate (gel) dries and cracks (turns to powder), this signals replacement time (for the cartridge). (Replace all (name) (units) every (one) (two) (three) (four) months (season)).

STORAGE: Store in a cool area away from children.

DISPOSAL: Wrap and put in trash collection.



OFF! Moth Proofer 5

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid contact with skin or eyes. Wash hands thoroughly after handling.

STATEMENT OF PRACTICAL TREATMENT: IF SWALLOWED, DO NOT INDUCE VOMITING. Contact a physician or poison control center. Vomiting may cause aspiration pneumonitis. IF ON SKIN: remove with soap and water. If irritation persists, seek medical attention. IF IN EYES: flush eyes with plenty of water. If irritation persists, seek medical attention.

Questions? Comments? Call 800-558-5252 weekdays, 9-9 Eastern Time or Write Helen Johnson
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EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

Unit Labeling

OFF! Moth Proofer 5

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Net Contents .11 oz. per unit

Keep Out Of Reach Of Children

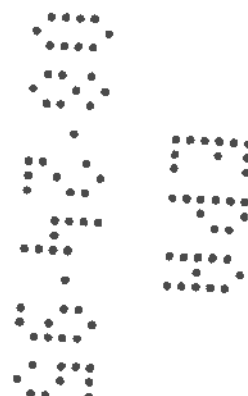
CAUTION

See outer package for additional precautionary statements and complete directions

EPA Reg. No. 4822-

EPA Est. No. 4822-WI-1

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Inert ingredient information may be entitled to confidential treatment

Product ingredient source information may be entitled to confidential treatment



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Biopesticides and Pollution Prevention Division
(H7501-W)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg.
Number:

4822-440

Date of
Issuance:

AUG 12 1996

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(under FIFRA, as amended)

Term of Issuance:

Unconditional

Name of Pesticide Product:

OFF! Moth Proofer 5*

Name and Address of Registrant (include ZIP Code):

S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is unconditionally registered in accordance with FIFRA sec. 3(c)(5). Once a pesticide is unconditionally registered, however, it is not regarded as permanently acceptable. Unconditional registration does not eliminate the need for continual reassessment of a pesticide. If EPA determines, at any time, that additional data are required to maintain an existing registration, the Agency will require submission of such data under Section 3(c)(2)(B) of the Federal Insecticide Fungicide and Rodenticide Act (FIFRA).

1. A stamped copy of the label is enclosed for your records.
2. Change the label by revising the EPA Registration Number to read, "EPA Reg. No. 4822-440".
3. The following information must appear on each dispenser/sachet after it has been activated (removed from packaging and foil seal removed): - Product Name, - Ingredient Statement, - Registration Number, - "Keep out of reach of children", - Signal Word (CAUTION), - A Referral Statement ("see [box] for detailed instructions"), - Company name and address.
4. Submit five copies of the final printed label for the record.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Signature of Approving Official:

Gant L. Anderson

Date:

8/12/96

FRONT PANEL

OFF! Moth Proofer 5

New

(Fresh) (Pleasant) Lavender Scent

Outdoor Fresh Scent

Spring Fresh Scent

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(Country) Fresh Scent

Soft Sachet Scent

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Sunshine (Fresh) Scent

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(Effectively) controls moth problems with a pleasant scent

No unpleasant mothball smell

No harsh chemicals

No need to dry clean (or) (air out your) clothes (garments) after storage (use)

Protects clothes from moth damage

Keeps moths off clothes

Effective for one season

Lavender Formula

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Repels (kills) (controls) (moths) (moth eggs and larvae) (pupae) (which cause damage to clothes)

Easy to use

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Convenient to use

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Not only protects (your) clothes, it freshens (your) closet (drawers)

Protects (your) clothes from moths (damage) with a (natural), fresh (pleasant) (lavender) scent

Pleasant protection for your clothes

Lasts (up to) (two) (three) (four) (months) (season long) (for one season)

Protects clothes from moth damage for (up to) (two) (three) (four) (months) (season long) (for one season)

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Contains (number) (name) (hangers) (units) (fresheners)

Net Contents: contains 2 units

net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back

K:\common\ic\ljp\rmz\moth8

ACCEPTED
with COMMENTS
in EPA Letter Dated

AUG 12 1996

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

4822-440

BACK PANEL

OFF! Moth Proofer 5

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. (Separate the two units.) *(Remove backing (cardboard) label from unit using pull tab.)*
Slowly remove foil label from the (fragrance) cartridge using peel tab. Do not remove or puncture white (clear) film protecting (colored) (fragrance) concentrate (gel). This film controls the release of concentrated (freshening) (protection) ingredients. (Insert cartridge into holder unit.)
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3. When the (fragrance) concentrate (gel) dries and cracks (turns to powder), this signals replacement time (for the cartridge). (Replace all (name) (units) every (one) (two) (three) (four) months (season). *Replace stored units every season.*

STORAGE: Store in a cool area away from children.

DISPOSAL: Wrap and put in trash collection.

OFF! Moth Proofer 5

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT: IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

Questions? Comments? Call 800-558-5252 weekdays, 9-9 Eastern Time or Write Helen Johnson © 1996 S. C. Johnson & Son, Inc. Racine, WI 53403-2236 U.S.A. All Rights Reserved.

EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

Unit Labeling

OFF! Moth Proofer 5

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EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

August 12, 1996

Dr. Leslie Lake (MS-126)
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236

Dear Leslie,

RE: Off! Mothproofer 5, EPA Registration No. 4822-440

The unconditional registration of the product identified above has been granted. Enclosed for your records are your notice of registration, a stamped approved label, the registration eligibility document (for the Directors approval of the active ingredient), and a copy of all the science reviews for the end-use product and for the experimental use permit.

This week I will be preparing a Federal Register notice that announces the new registration of your product and a fact sheet that discusses the chemical and toxicological properties of your product. I will send you a copy of the fact sheet after I finish it.

If you have any questions, feel free to ask. I look forward to working on your applications for the technical and manufacturing use product.

Sincerely,



John T. Tice
Regulatory Action Leader (Lavandin oil)
Biopesticides & Pollution Prevention Division (7501W)

Enclosures

J.Tice/7501W/7033088295/FileSymbo4822-440/Lavandin oil/040500

CONCURRENCES

SYMBOL	7501W							
SURNAME	Karpe							
DATE	8/12/96							

August 19, 1996

Called by Maren Grow from SC Johnson on behalf of Jim Wallice Registration Specialist
Re: Off Mothproofer 5

She wanted to talk about the Referral Statement, Requirement 3.

Q Because there is no further "use" of the product after activation, could they dispense with the Referral statement.

A Probably yes, send in a draft label and we will look at it. They must have safety and company information on the opened package.

414-260-4722 Jim ex 6881

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net wt. .22 oz

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CAUTION

See additional precautionary statements on back

K:common/icljplmz:moth8

ACCEPTED
with COMMENTS
In EPA Letter Dated

AUG 12 1996

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
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4822-440

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EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

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EPA Est. No. 4822-WI-1

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 8 1996

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Consideration of Section 3(c)(5) Unconditional Registration for S.C. Johnson's product OFF! Moth Proofer 5 containing the new A.I. lavandin oil. (EPA File Symbol 4822-UUN)

-DECISION MEMORANDUM-

FROM: Janet L. Andersen, Acting Director
Biopesticides and Pollution Prevention Division

TO: Daniel M. Barolo, Director
Office of Pesticide Programs

Attached is a decision memorandum for lavandin oil in the new standard registration document format. The format identifies all data, issues and regulatory decisions for this new active ingredient and product.

Because the format does not contain an approval or regulatory concurrence section, your signature and concurrence are requested on this document.

My staff and I would be happy to answer any questions you may have about this registration.

CONCUR: X *P2c for DMB*

NONCONCUR: _____

DATE: 8/9/96

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 8 1996

MEMORANDUM

SUBJECT: Consideration of Section 3(c)(5) Unconditional Registration for S.C. Johnson's product OFF! Moth Proofer 5 containing the new A.I. lavandin oil, (EPA File Symbol 4822-UUN)

-DECISION MEMORANDUM-

FROM: Janet L. Andersen, Acting Director *Janet L. Andersen*
Biopesticides and Pollution Prevention Division

TO: Daniel M. Barolo, Director
Office of Pesticide Programs

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CONCUR: _____

NONCONCUR: _____

DATE: _____

Tice/7501-w/308-8295/PCC040500/08-06-96/4822-UUN

CONCURRENCES

SYMBOL	7501-w	7501w	7501c				
SURNAME	TICE	TOALA	CRISP				
DATE	8/6/96	8/8/96	8/9/96				

6/24/96



S. C. Johnson & Son, Inc.
Research, Development, & Engineering Division
Scientific Support & Government Compliance
Registration & Device Safety
1525 Howe Street
Racine, Wisconsin 53403

June 24, 1996

Mr. John Tice
Regulatory Action Leader
U.S. Environmental Protection Agency
Office of Biopesticides and Pollution
Prevention Division
2800 Jefferson Davis Highway
Arlington, VA 22202

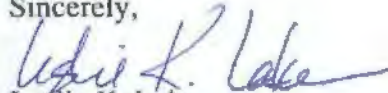
Dear Mr. Tice:

Per our recent phone discussion and guidance provided by you, S.C. Johnson & Son, Inc. will be pursuing registration of the manufacturing use product (MUP) [REDACTED] (95% of OFF! Mothproofer 5) and the technical, Lavandin Oil. We will be submitting our application for registration of the MUP sometime within the next two weeks, with the technical application following in early August. It is my understanding that the data generated in support of OFF! Mothproofer 5 will also support registration of the MUP, and that data from the public literature can be cited in support of Lavandin oil.

We appreciate your expedited review of the application for the MUP as we need to begin shipping [REDACTED] to our manufacturing site from [REDACTED] as soon as possible.

Please give me a call if you have questions concerning the above or any additional thoughts on compliance with 40 CFR 152.30.

Sincerely,


Leslie K. Lake
Program Leader, Registration

cc: Bob Torla/EPA
Janet Anderson, Ph. D./EPA
Jerry Carlson, Ph. D./SCJ
[REDACTED]
Richard Rudin/SCJ
Chris Moeller/SCJ

LKL/bsh
Letter-LL

Product ingredient source information may be entitled to confidential treatment



**Worldwide Consumer Products
Research, Development & Engineering**

FACSIMILE TRANSMISSION SHEET

TO: ATTENTION: *Johnice* - ERA-BPPD
COMPANY: _____
FACSIMILE PHONE NO: (703) 308-7026

NUMBER OF PAGES: 2
(Includes Transmission Sheet)

The information contained in this communication is **confidential**, and intended only for the use of the addressee. Unauthorized use, disclosure or copying is strictly prohibited. If you have received this communication in error, please immediately notify us, collect, at the contact number below, so that we can arrange for retrieval of the original document at our cost. Thank you.

FROM: Leslie Lake DATE: 6/25/96
Regulatory Affairs & Registration Group

MESSAGE:

John:

* Apparently we never received MRID #s for the tox studies submitted for Off! Moth Proofer 5 (4822-WN). (I double-checked w/ Geri Vander West @ SCT)

* Can you please fill in the attached & fax back to me @ (414) 260-4716?

Thanks!

or let me know who I
should call to get
the #s — the.

*If there are problems with this transmission, please telephone (414) 260-2622
OR Fax us at (414) 260-4716. Thank you.*



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

VIA FEDERAL EXPRESS

July 20, 1995

Ms. Janet Andersen
Acting Division Director of Biopesticides
and Pollution Prevention Division (7503W)
U.S. Environmental Protection Agency
Office of Pesticide Programs
2800 Jefferson Davis Highway
Arlington, VA 22202

Dear Ms. Andersen:

Re: OFF! Moth Proofer 5
EPA Reg. No. 4822-UUN

We are now submitting the necessary studies to complete our registration package for the above-mentioned registration. These studies were done non-glp based on discussions we had with Dwight Welch and the Off! Moth Proofer review team.

Also enclosed is a summary of each of the relevant toxicity categories for your information. This summary should also be given to the toxicologist reviewing the studies we are submitting.

Enclosed please find:

Toxicity Category Summary
Confidential Statement of Formula
5 copies of draft labeling
3 copies of Primary eye irritation study _____
3 copies of Primary dermal irritation study _____
3 copies of acute oral toxicity evaluation _____
3 copies of fragrance ingredient toxicity and irritation evaluation _____

If you have any questions regarding this submission please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist
Enclosures

5/16/96
BPPD



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236
Phone: (414) 631-2000

VIA FEDERAL EXPRESS

May 8, 1996

Mr. John Tice
Regulatory Action Leader
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Mr. Tice:

RE: Off! Moth Proofer 5, EPA Reg. No. 4822-UUN

As per your conversation with Karen Smith today, please find enclosed copies of pages 341-348 of "Perfume and Flavor Materials of Natural Origin" by Steffen Arctander and Monograph No. 2618 of Flavor and Extract Manufacturer's Association, regarding Lavandin Oil.

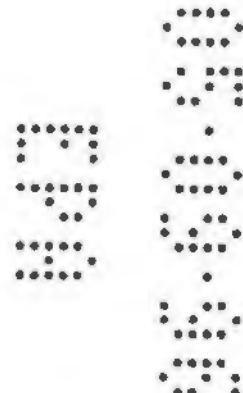
If you have any questions regarding this label please call me at 414-260-3553.

Sincerely,

A handwritten signature in cursive script that reads "Geri L. Vander Leest".

Geri L. Vander Leest
Registration Specialist

Enclosures



FEMA No. 2618

Lavandin oil (Lavandula hybrida)

FEMA 2618
8022-15-9

Synonyms
Lavandula hybrida oil

Identifiers
CAS Registry 8022-15-9
RIFM Monograph 190 (published 1976:FCT,v14,p447 (Binder, p484))

Regulatory Information

Evaluating Agency	Determination	Agency Reference
DSL	Registered	
FDA	GRAS	182.20
TSCA	Registered	

EINECS, 294-47Registered as 91722-69-9.

FEMA Classifiers
Generally Recognized as Safe as a flavor ingredient - GRAS 3
Occurrence: Reported to occur in nature.
Date of Use: First use 1900.
Volume (in kilograms):
1970 210 1975 120 1982 776
1987 18

Uses (in ppm)

Category	Usual	Max	Category	Usual	Max
01 Baked Goods	11.99	16.78	20 Gelatin Pudding	6.54	10.24
07 Frozen Dairy	8.57	12.83	23 Non-alcoholic Bever*	2.52	5.56
16 Soft Candy	9.34	14.13	24 Alcoholic Beverage	2.52	5.56

PADI: 2.40 mg

Description
EOA Spec. no. 41. The main constituent of lavandin oil is linalool

FEMA No. 2618

(Fenaroli, 1971).

Preparation

By steam distillation of the flowering stalks of *Lavandula hybrida*
Reverchon (Gildemeister & Hoffman, 1961)

Physical data

Flash point: 151 F; CC, reference: FMA

Specific gravity: 0.885, reference: FMA

Vapor pressure: ~0.2 mm Hg 20C, reference: FMA

Biological Data

Acute toxicity LD50.

Route: oral. Species: rat. Protocol: 10 rats.

Results: 5.0 g/kg-no effects, acute oral LD50 > 5 gm/kg. (Moreno, 1973).

Route: skin. Species: rabbit. Protocol: 10 rabbits.

Results: 5.0 g/kg-no effects, acute dermal LD50 > 5 gm/kg.
(Moreno, 1973).

Irritation.

Route: skin. Species: man. Sample tested: L-242981. Protocol: A 48 hour
closed patch test on the backs of 10 male subjects. Vehicle was
petrolatum.

Results: 5 %-no effects. (Kligman, 1971).

Route: skin. Species: rabbit. Protocol: 10 rabbits observed during LD50
study. Irritation evaluated on day 1.

Results: 5.0 g/kg-irritant effects, slight redness in 2, moderate
redness in 1, slight edema in 4 and moderate edema in 3.
(Moreno, 1973).

Sensitization.

Route: skin. Species: adult human. Protocol: 200 dermatitis patients
were tested for sensitivity to 35 essential oils. 13 of the 200
reacted positively to balsams. In addition, 50 subjects previously
sensitized to balsams were also tested. Comments: Of the 50 subjects
were positive to one or more of 4 balsams (which comprised balsam of

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Peru, wood tars, colophony and turpentine). 200 + 50 positives were: 31 to Balsam Peru, 11 to wood tars, 7 to colophony and 31 to turpentine. Vehicle was paraffin.

Results: 2 %-sensitization effects, 1 positive in balsam sensitive patient of the 200. Positives in the 50 were: 1 wood tars patient. (Rudzki, 1976).

Patch test.

Route: skin. Species: adult human. Protocol: 5315 eczematous patients patched with ICDRG perfume mixture. 299 (5.6%) were positive. Among these 299, 86 were tested with 35 essential oils. 42 were tested with components of perfume mixture. Comments: See Rudzki, 76 MF no. 1090. Results: 2 %-sensitization effects, 4/86 patients (4.6%) reacted. (Rudzki, 1986).

Route: skin. Species: adult human. Protocol: 450 patients with dermatitis were tested. Vehicle was yellow soft paraffin. Comments: Simultaneous reactions to the test material and Peru Balsam or other balsams is also presented.

Results: 2 %-positive effects, in 3. (Rudzki, 1977).

Maximization.

Route: skin. Species: man. Sample tested: L-242981. Protocol: Vehicle was petrolatum. 26 male subjects completed the study. Results: 5 %-no effects. (Kligman, 1971).

Phototoxicity.

Route: skin. Species: mouse. Protocol: 6 mice, Skh:hairless-1, received 1 application of 20 ul per 2 cm² on the back. Irradiation by fluorescent blacklight or Xenon lamp followed 30 min after application. Examined at 4, 24, 48, 72 and 96 hr. Blacklight-1 hr at integrated UVA of 3 W/m². Xenon lamp-40 min, weighted erythema energy = 0.1667 W/m².

Results: 100 %-no effects. (Forbes, 1977).

Route: skin. Species: pig. Protocol: 2 miniature swine received 1 application of 20 ul per 2 cm² on the back. Irradiation by fluorescent blacklight or Xenon lamp followed 30 min after application. Examined at 4, 24, 48, 72 and 96 hours. Blacklight-1 hr at integrated UVA of 3 W/m². Xenon lamp-40 min, weighted erythema energy = 0.1667 W/m².

Results: 100 %-no effects. (Forbes, 1977).

Photopatch test.

Route: skin. Species: adult human. Protocol: Forty-eight subjects w/ a previous history of allergic rxn to fragrances were patch-tested. Test products were dissolved in white petrolatum and deposited on 3 sites on subjects' dorsal skin using Finn chambers fixed to microporous tape. Ppat tests were performed on 2 sites (3rd site = control). UComments: VA(315-400) dose: 10j/cm² & UVB(280-315) dose: 75% minimal erythema dose were applied. Sensitization rxn were scored @ 24 & 72 hr. Conc. @ which sensitization was no longer observed was also determined. Moderate response = 28-52% positive responders, weak to moderate = 25-35%, weak = 8-28%.

Results: 2 %-sensitization effects, 36% of all subjects tested exhibited a positive response. Conc. @ which a positive response was no longer observed was <0.06%. Data @ all dose levels refer to extracts of lavandin (unspecified). 5 %-sensitization effects, 40% of all subjects tested exhibited a positive response. 10 %-sensitization effects, 44% of all subjects tested exhibited a positive response. (Bouhlal,1989).

Route: skin. Species: adult human. Protocol: Forty-eight subjects w/ a previous history of allergic rxn to perfume materials were patch-tested. Test products were dissolved in white petrolatum @ low, infra-irritant conc. and deposited on 3 sites on volunteers' dorsal skin using Finn chambers fixed to microporous tape. Ppat tests were performed on 2 sites (the 3rd serving as control): UVA irradiation (315-400) dose:10j/cm²; UVB irradiation (280-315) dose:75% of the minimal erythema dose. Readings for photosensitization were performed 24 & 72 hr. later. Conc. @ which photosensitization was no longer observed was also investigated. Results: no effects. (Bouhlal,1989).

Unclassified.

Route: in vitro. Species: fungi. Protocol: Antifungal activity was evaluated using the filter paper disk method. The organisms used were *Lenzites trabea*, *Polyporus versicolor* and *Lentinus lepideus*. The filter paper was saturated with neat test material.

Results: positive effects. (Maruzzella,1960a).

Route: in vitro. Species: bacteria. Protocol: Antimicrobial activity against bacteria, yeasts and molds was studied. Comments: Details of procedure not given.

Results: positive effects. (Blakeway,1982).

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Route: in vitro. Species: bacteria. Protocol: The antibacterial activity of essential oil vapor against a variety of Gram-positive and Gram-negative bacteria was investigated.

Results: positive effects. (Maruzzella, 1960).

Route: in vitro. Species: fungi. Protocol: The detection of the antifungal activity of various test cpds was made by observing their effects on growing cultures of 18 organisms both pathogenic & nonpathogenic. Small sterile paper discs were thoroughly moistened w/ oil to be tested and placed on agar plates previously seeded w/ 2 cc. of Comments: Organism in broth cultures. All organisms were grown in maltone broth for 72 hrs. All plates were incubated @ room temp. for 48 hrs. Zones of inhibition around paper disc were measured.

Results: positive effects, Sum of zones of inhibition for each organism tested was 143 mm. (Maruzzella, 1958).

Route: in vitro. Species: insect. Protocol: The effect of test compound(s) on mites was determined. Mites were kept in contact w/ the volatiles for 24 h @ 25 C, in 75% relative humidity in an airtight petri dish to determine the amount (ul) of the test cpd required to give 100% mortality of the mites.

Results: positive effects, LD100 values (ul) for *Dermatophagoides pteronyssinus*, *Dermatophagoides farinae* and *Tyrophagus putrescentiae* were 40, 10, and 15 respectively. (Watanabe, 1989b).

Analytical methodology.

(Klein, 1967).

(Peyron, 1971).

(Mookherjee, 1973).

(Kustrak, 1975).

(Lawrence, 1977b).

(Tucker, 1984).

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(Pascual, 1991).

(Pellerin, 1991).

(Hener, 1992).

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- (Kreis, 1992).
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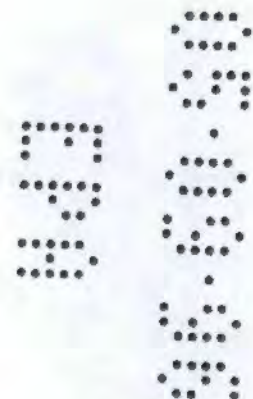
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other non-floral fragrances. It blends well with clove and other spice oils, bergamot, oakmoss, sage clary, cypress, labdanum, amylsalicylate, coumarins, linalool, isobornylacetate, etc. The water-absolute can even replace or support the effect of high-grade Lavender Oil in certain perfume compositions. Lavandin "Water Absolute" is an interesting perfume material and it should have a solid future in creative perfumery as well as a possible application in the reproduction of other essential oils.

The production of Lavandin "Water Absolute" is limited, but can be adjusted to demand with due notice. In this connection it is worthwhile noting that Lavandin Oil is produced only once a year. If there is no "water-absolute" available in November, there will be no possibility of buying this material for another 8 months or so.

Lavandin Concrète.

Even newer than the essential oil of lavandin are the extracted Concrète and Absolute from Lavandin. The concrètes have found extensive use in soap perfumery, and range among the most inexpensive floral-herbaceous perfume extracts.

A Concrète of Lavandin is produced by solvent extraction (usually petroleum ether or benzene) of the flowering tops of the Lavandin shrub, see Lavandin Oil. The solvent is recovered under vacuum but it is not unusual that trace amounts of solvent are perceptible in the odor of the commercial concrète.

As the lavandin plant is cultivated almost exclusively in the south of France, the Concrète of Lavandin is produced in nearby extraction installations belonging to a number of perfume houses. Very small quantities of lavandin concrète are produced in Morocco, Spain, Hungary and Yugoslavia, mainly for local use.

Lavandin Concrète (from Benzene-extraction) is a solid, waxy, dark green mass of intensely herbaceous, rich but not very sweet odor. The petroleum ether-extract concrète is a viscous liquid, just pourable at room temperature. Its fragrance closely approaches that of the dry herb of lavandin, almost chokingly camphoraceous-woody, without being sharp. It is typical of a natural extract, well balanced in odor, reproducing the floral as well as the leaf-stem-herb notes. The latter are derived primarily from non-volatile components, and this may be the reason for the

naturalness in the odor of the concrète as compared to that of the essential oil.

As mentioned above, Lavandin Concrète has extensive use in soap perfumery where its content of waxes, etc. is an advantage, and where also insolubility is no drawback. Sweetened up coumarin, heptalactone, hydroquinone dimethyl ether, isoeugenol, etc. it forms an excellent base for a lavender soap compound. It is soluble in most essential oils and synthetic perfume materials and it blends well with all lavender materials, amylsalicylate, oakmoss, artificial musks, needle oils or other pine odors, cedarwood products, cis-para-tertiary butyl cyclohexanylacetate, etc.

Lavandin Concrète is readily available in large quantities in the late fall when the autumn crops have been treated. The green concrète can also be partially decolorized or processed to an absolute, see Lavandin Concrète, Decolorized and Lavandin Absolute from Concrète.

Lavandin Concrète, decolorized.

The intensely green color of Lavandin Concrète (benzene or petroleum ether extract) can be somewhat of a disadvantage, e.g. when this material is used in a perfume for a white or cream-colored product, and the concentration of Lavandin Concrète in the perfume exceeds a few percent. Various methods of decolorization are utilized, but a complete removal of all coloring matter without serious effect on the odor is well-nigh impossible. The majority of the chlorophyll and related substances can be removed, but even this process affects the odor. Charcoal treatment and subsequent filtration of the hydrocarbon solution of the concrète yields an olive-green product, whose color is much less intense than that of the natural concrète. Extraction of the herb with petroleum ether gives a lighter colored concrète than in the case of extraction with benzene or gasoline.

There are several snow-white Lavandin Concrètes on the market, but their olfactory properties show a substantial difference from those of green concrètes. In some cases, the white concrètes are merely compositions of lavandin myrsin acid, traces of coumarin, methyleugenol, etc., and they have a much thinner odor ("body") and poorer performance on soap than the green concrètes. A partially decolorized Lavandin Concrète is preferable. It offers a "ho-

medium" similar to that in the case of oakmoss: a fair reduction in color intensity, and still a good odor performance.

Colorless or Decolorized Lavandin Concrète has not attained the same importance as its green parent substance, and it will probably remain a small item on the market, used mainly by those who need a colorless perfume and still want a lavandin-concrète effect.

Lavandin Oil.

The story of Lavandin Oil is one of tremendous success. Unknown until the late 1920's, this essential oil today ranges among the world's 10 largest perfume oils from nature (in respect to volume). About 1000 metric tons was distilled in 1959, and half of this amount was either sold or contracted for even before it was distilled. From a 1954-price of almost U.S. \$3.00 per lb., it has dropped to about \$0.80 five years later. Even when we consider the very good yield, the very large and modern distillation units, the mechanization and rational centralization in the production, it is almost incredible that an essential oil can be distilled from a shrub, a once-a-year crop, and sold at this low price.

Lavandin is a hybrid plant, developed by crossing the true lavender plant (*Lavandula Officinalis*) with the aspic or "spike" lavender (*Lavandula Latifolia*). The resulting plant is called *Lavandula Hybrida*, and it exists in a great number of forms (varieties), a few of which are distinctly more interesting than the others. When visiting the lavender fields, aspic fields and the cultivated lavandin areas, one is often told that the blue color of the lavender and the grayish color of the aspic will show up in a nuance in the lavandin, revealing which one of the parent plants is predominant in the hybrid. However, it is not possible to predict the yield, the composition or the approximate odor type of the oil from the color of the flowers alone. A wild growing lavandin is found in the south of France where both parents also grow wild, although at different altitudes. *Lavandula Hybrida* is cultivated on a large scale in the south of France, while small quantities are distilled in Spain, Hungary, Yugoslavia, Argentina, etc. The wild-growing lavandin plants are of insignificant importance for today's large-scale distillation of lavandin oil.

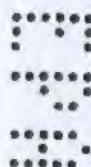
Lavandin Oil is a pale yellow to almost colorless

liquid which can be somewhat turbid and brownish after shipment in galvanized drums. A filtration and separation of water may be necessary in order to produce an attractive looking oil. The odor is strongly herbaceous with a very fresh camphene-cineole-like topnote which should not be distinctly camphoraceous. The rich, woody-herbaceous notes of the body components will usually become predominant within the first 60 seconds on a perfume blotter. It is important to evaluate a lavandin oil on a freshly dipped blotter since the characteristic notes of lavandin and the typical notes of poor oils or adulterated ones will show up immediately. The odor of the oil is not very tenacious, and after a few hours on the blotter, it may be impossible to distinguish a good quality from a poor one.

Lavandin Oil is used for its fresh, refreshing notes, and is often used in very high concentration in the perfume formula. For detergent perfumes, liquid cleaners, dishwasher liquids, etc., this oil gives excellent results and does not need strong fixation. In soap perfumes, a good fixation of the lavandin oil is necessary, as well as in hair preparations, etc.

The oil consists mainly of linalool, linalyl acetate (today about 30 to 32%, in some cases even more), cineole, camphene, pinene, traces of camphor, and a small, but very important percentage (one or two percent) of ethyl-n-amyl ketone. This last material has often been confused with methyl-hexyl-ketone, and the latter has even been named "lavender ketone" in various literatures. This ketone does not, to the author's knowledge, occur in nature. It does not give that "missing lavender touch" to a perfume based on synthetic materials. (The author is well aware, that this is a matter of opinion, not a matter of knowledge, but he feels convinced that he shares this opinion with the majority of other perfumers).

Lavandin Oil blends well with countless natural and synthetic perfume materials. More recently the old-fashioned "Rondeletia"-theme has found a renaissance in the combination of lavandin oil with clove oils, eugenol, bay leaf oil, cinnamon leaf oil, etc. Other blenders are aliphatic aldehydes (modifiers, topnotes), amyl salicylate, citronella oils, cypress oil, decyl alcohol, geranium oils, geranyl acetone, isobornyl acetate, pine needle oils, thyme or origanum oils, patchouli (also fixative), etc. Fixation is obtained with sesquiterpene fractions from various essential oils (good



for soap perfumes), labdanum products, nitromusks, coumarins, oakmoss, lavandin concrete, etc.

Lavandin Oil is also acetylated to yield a product containing about 75% of "natural" linalyl acetate. This product was a source of low-cost linalyl acetate in the 1946 to 1956 period, when linalyl acetate from bois de rose oil cost about U.S. \$ 8.00 per lb.

10 to 15% of monoterpenes can be eliminated from the lavandin oil by careful vacuum distillation. The oil loses completely its characteristic odor and resembles certain grades of lavender oil. It is conceivable, that the vacuum distillation also causes a loss of cineole and camphor, whereby the typical notes of lavandin obviously disappear.

Lavandin Oil is available in almost unlimited quantities, but it seems to find wider application every year, and the increasing production is readily absorbed by the hungry soap perfume industry.

Lavender Absolute from Concrète.

Lavender Absolute is prepared by alcohol extraction of the lavender concrète, chilling of the alcoholic solution and filtration and subsequent removal of the solvent in vacuum. Lavender Absolute is produced almost exclusively in France. Smaller quantities are produced in Italy.

Lavender absolute is a dark green, viscous liquid of very rich, sweet-herbaceous, somewhat floral odor; in dilution, it bears a close resemblance to the odor of the flowering lavender shrubs. Its woody-herby undertone and coumarin-like sweetness duplicate the odor of the botanical material far better than does the essential oil. The absolute is sweeter but less floral than the essential oil, and the two materials can form a very pleasant combination. However, one cannot replace the other in compounding. Chemically, the difference between the essential oil and the absolute seems surprisingly small in percentage. The absolute contains almost an equal amount of linalool and linalylacetate (or other linalyl esters), these materials constituting about 90% of the oil. Typical notes in the absolute are probably derived from coumarin, umbelliferone and their derivatives, most of which are non-distillable with steam. Also linalyl esters of non-volatile acids. Although most of the umbelliferone-ethers are odorless,

they may play important roles as fixatives or stabilizers in the absolute.

Lavender Absolute is used in citrus-colognes, chypres, fougères, new-mown-hay bases, forest notes, etc. It blends well with labdanum, oakmoss, vetiver, patchouli, pine needle oils, coumarin, heptalactone, terpinyl propionate, geraniol and esters, sage clary, dodecanal, flouve, nitromusks, salicylates, etc.

A partially decolorized Lavender Absolute has been prepared directly from the green lavender concrète. These absolutes are available, but not very common items. They are olive-green or yellow in color, and the odor is somewhat different from that of the green absolute.

Lavender Absolute from Distillation Water is also available, but it is a comparatively rare item. Its odor is distinctly different from that of the absolute from concrète: it is more haylike, less sweet, less floral. It is usually a mobile liquid, pale yellow in color. It finds use as a "rounder-off" and modifier in certain new-mown-hay perfumes of the more modern type, in herbaceous bases, and in the duplication of certain flower absolutes and essential oils.

Lavender Concrète.

A Lavender Concrète is produced by extraction of the freshly cut flowering herb of true lavender, *Lavandula Officinalis*, with benzene, gasoline, petroleum ether or other hydrocarbon solvent followed by removal of the solvent in vacuum. This extraction is carried out in or close to the growing areas in the south of France. Insignificant quantities are produced in Italy and a few other countries.

According to the solvent used, Lavender Concrète varies in appearance from waxy solid to viscous liquid. Petroleum ether yields a more liquid concrète. The color is usually dark green, but it appears darker in the liquid products than in the waxy-solid ones, probably due to the microcrystallized myristic acid, etc. in the waxy concretes. Apart from an inevitable note of the solvent, the odor is generally sweet-herbaceous, somewhat haylike, coumarin-like, but resembling the lavender flowers and stalks very closely.

Its poor solubility in alcohol is no drawback for Lavender Concrète when this material is used in soap perfumes. The concrète is soluble in most perfume materials, and the waxes, myristic acid,

palmitic acid, etc. will only act as fixatives and blenders in such cases. The concrète is readily available at a comparatively low price; a fact, which makes it practical to apply Lavender Concrète in soap perfumes of the lavender type, fougères, new-mown-hays, chypres, forest-notes, pine needle fragrances, ambres, "tabac" perfumes and numerous other types. The concrète blends well with bergamot, citrus oils (of the "lighter" type, too), labdanum products, oakmoss products, patchouli, rosemary, sage clary, thyme oils, etc. and with coumarins, nitromusks, cedarwood derivatives, eugenol and isoeugenol, nopylacetate, etc.

Lavender Concrète is occasionally adulterated. The most common additive is Lavandin Concrète. Exhaust waxes from the production of Lavender Absolute from Concrète are also used for "cutting" the true lavender concrète. The latter fraud is simply a dilution. A partially Decolorized Lavender Concrète is commercially available, but the author has yet to see (and smell) a decolorized material whose odor has not been affected severely by this process. In the case of lavender, the loss of attractiveness and naturalness of odor is not compensated for by the fact that one has disposed of part of the color problem which exists in the green concrète.

The major part of all Lavender Concrète produced goes into further processing to the Absolute. See Lavender Absolute.

Lavender Oil

Lavender Oil is steam distilled from the freshly cut flowering tops and stalks of *Lavandula Officinalis*, a wild growing or cultivated plant, native to the Mediterranean countries. Distillation takes place mainly in the south of France where the plants grow at medium altitudes of this mountainous region (from 600 to 1500 metres altitude). Distilleries located at high altitude produce oils of higher ester content, not only because of the theory that the high-altitude, wild-growing plants contain more esters, but also because of the fact that high-altitude distillation means lower-temperature-boiling. Consequently, the distilled oil is not exposed to 100°C. hot steam, but perhaps only to 92 or 93°C. Even this small decrease in temperature means that the hydrolysis of the natural linalylesters take place at a much slower rate. A rapid distillation at slightly reduced

pressure (high altitude) may thus produce an oil with nearly all the natural linalylesters.

Lavandula Officinalis (in several varieties) grows wild in the south of France, in Italy, Corsica and Yugoslavia. It is cultivated widely all over the world, however not always successfully. Some of these areas are in Argentina, Brazil, Bulgaria, Cyprus, England, Greece, Hungary, Italy, Japan, U.S.S.R., Spain, Tanganyika, Tasmania, Turkey and Yugoslavia. There is some experimental cultivation and distillation in the farwestern state of Washington, U.S.A. English distilled lavender oil from English grown lavender plants deserves special mention (see below). Of the other countries mentioned, only Italy is exporting quantities of any significance. The production in Tasmania is mainly absorbed by Australia; Japan produces 2-3 metric tons per year which is far from sufficient for its own needs, and even the Russian production does not cover local consumption. The annual production in France varies from about 50 metric tons to almost 100 tons. It is difficult, however, to establish accurate figures for the production of this oil since it is subject to very extensive cutting, adulteration and other kinds of "handling", during which processes many other locally distilled oils and synthetic perfume materials are used in quantity.

English Lavender Oil is distilled from a different variety of the lavender plant. It yields an oil rich in linalool, but rather poor in linalylesters. However, it is not rough or harsh like the aspic or lavandin oils, but represents an individual type of lavender which is obviously appreciated in the country where it is a common garden plant, and where its fragrance is well-known and very popular. It should be emphasized, that English Lavender Oil is distilled from flower material with very few stalks or leaves (compare Rosemary "flower" oil).

Lavender Oil (French type) is a colorless or pale yellow liquid of sweet, floral-herbaceous refreshing odor with a pleasant, balsamic-woody undertone. An almost fruity-sweet topnote is of a very short life, and the entire oil is not distinguished by its tenacity in odor. It is used extensively in colognes (citrus-colognes or the well-known lavender-waters), in fougères, chypres, ambres and countless floral, semi-floral or particularly in non-floral perfume types. The oil blends well with bergamot and other citrus oils, clove oils (for "Rondeletia" type perfumes), flouve, liatris,

5/13/96

S. C. Johnson & Son, Inc.

Racine, Wisconsin U.S.A. 53403-2236

Worldwide Consumer Products
Research, Development & Engineering

FACSIMILE TRANSMISSION SHEET

TO: ATTENTION: John Tice
COMPANY: _____
FACSIMILE PHONE NO: (703) 308-7026
NUMBER OF PAGES: 3
(includes Transmission Sheet)

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FROM:

Leslie Lake / kmsmith
Regulatory Affairs & Registration Group

DATE:

5/13/96

MESSAGE:

John,
The following may be useful
for the risk comparison / risk benefit
section of the notoprofen RED.
Please call (414) 260-2955 if you
have any questions.

Best regards,Leslie(My KAS)

If there are problems with this transmission, please telephone (414) 260-2622
OR Fax us at (414) 260-4716. Thank you.

Off! Moth Proofer - A Safer Alternative to Mothballs

Mothballs are a primary form of moth control products currently available to consumers. Mothballs contain either p-Dichlorobenzene (p-DCB) or Naphthalene as the active ingredient. Both of these compounds exhibit less than favorable safety profiles. Following is a brief summary of the safety concerns associated with these compounds:

Naphthalene

Naphthalene is a human poison by ingestion. In a Drinking Water Health Advisory for Volatile Organic Chemicals, the USEPA reports the fatal human dose from oral exposure to be approximately 2 grams. Poisoning may also occur by the inhalation or dermal routes of exposure.

Naphthalene is readily absorbed through the skin. This is worrisome given that humans, namely infants, may be exposed to residual naphthalene on clothing that has been stored with mothballs containing naphthalene. It has been reported that diapers or clothing stored with mothballs and used directly on infants have caused skin rashes and systemic poisoning¹.

The signs and symptoms of naphthalene exposure include: nausea, vomiting, headache, diaphoresis, hematuria, hemolytic anemia, fever, hepatic necrosis, convulsions, and coma².

p-Dichlorobenzene (p-DCB)

USEPA classifies p-DCB as a possible human carcinogen; the State of California lists p-DCB as a chemical "known to the state to cause cancer" with a no significant risk exposure level of 20 micrograms per day.

An OSHA Occupational Health Guide to Chemical Hazards reports that exposure to p-DCB may cause headaches, swelling around the eyes, and a runny nose. p-DCB vapors may also cause irritation to skin, throat and eyes³.

Lavandin oil

In contrast to Naphthalene and p-DCB, the active in Off! Moth Proofer - Lavandin oil - poses no significant risk to human health. Lavandin oil is Generally Recognized as Safe (GRAS), is approved by the FDA for food use, and is also approved by the Flavor and Extract Manufacturer's Association (FEMA). The primary constituent of Lavandin oil, linalool, is frequently used in fruit and spice complexes, meat flavorings and in cocoa and chocolate imitations⁴.

The toxicity profile of the Off! Moth Proofer end-use product is also favorable. Off! Moth Proofer is essentially non-irritating to skin, is not toxic orally ($LD_{50} > 5$ g/kg) and is moderately irritating to eyes. Inhalation exposure is minimal, confirmed by results from aerial measurements obtained during a worst case exposure assessment. Emission rates observed for Off! Moth Proofer have also proven to be significantly lower than the rates observed for p-DCB mothballs.

S. C. Johnson & Son, Inc.

Racine, Wisconsin U.S.A. 53403-2236

Worldwide Consumer Products
Research, Development & Engineering

FACSIMILE TRANSMISSION SHEET

TO: ATTENTION: John Tice
COMPANY: EPA-BPPD
FACSIMILE PHONE NO: (703)NUMBER OF PAGES: 11
(includes Transmission Sheet)

The information contained in this communication is **confidential**, and intended only for the use of the addressee. Unauthorized use, disclosure or copying is strictly prohibited. If you have received this communication in error, please immediately notify us, collect, at the contact number below, so that we can arrange for retrieval of the original document at our cost. Thank you.

FROM: Leslie K. Lake DATE: 5/12/96
Regulatory Affairs & Registration Group

MESSAGE:

John:Following are data that address your questions
concerning worst case inhalation & exposure &
acute oral toxicity. Please call if ?s...(I'll be in "trial" til Wednesday PM, but
will try and get back to you asap.)Best Regards,

FAX MEMO: 5/12/96

From: Leslie Lake, SC Johnson Registration & Device Safety

To: John Tice, EPA-BPPD

RE: Mothproofer RED: Follow-Up Data

John:

Here's an example of how the SCJ closet air sampling data may be used in a "worst case" inhalation risk assessment:

* Hazard quotient: $\frac{ADD}{RfD}$

ADD = average daily dose (mg/kg/day)

RfD = reference dose (mg/kg/day)

Formula used to calculate ADD (or daily dose in this case) via inhalation (based on USEPA 1989):

$$ADD = \frac{C \times IR \times Bio \times ET}{BW}$$

C = vapour concentration (mg/m³)

IR = inhalation rate (m³/hr)

Bio = bioavailability (assumed to be 100%)

ET = exposure time (hrs/day)

$$\Rightarrow \frac{1 \text{ ug/m}^3 \times 1.4 \text{ m}^3/\text{hr} \times 4 \text{ hr/day}}{20 \text{ kg}} = \begin{matrix} 0.28 \text{ ug/kg/day} \\ (2.8 \times 10^{-4} \text{ mg/kg/day}) \end{matrix}$$

- 1.4 m³/h is the representative breathing rate (light activity) for a 6-yr-old child (USEPA Exposure Factors Handbook).

- I estimated the body wt. of a 4 - 6 yr-old to be 20 kg (default?).

RfD for comparison:

d-limonene RfD (general toxicity) = 2 mg/kg/day

$$* \text{ Calculation of ADD/RfD: } \frac{2.8 \times 10^{-4} \text{ mg/kg/d}}{2 \text{ mg/kg/day}} = 1.4 \times 10^{-4}$$

The HQ is <<< 1, so under this worst case scenario, risk is *de minimis*.

Following in this fax you'll find:

1) My 5/10/96 e-mail to you with a discussion of acute oral toxicity & air sampling data for mothproofer (2 pages)

2) USEPA R&D: Exposure Version 2, "A Computer Model for Analyzing the Effects of Indoor Air Pollutant Sources on Individual Exposure." Prepared by Air & Energy Engineering Research Lab, RTP (7 pages)

United States
Environmental Protection
Agency

EPA-600/8-91-013

April 1991

EPA

Research and Development

EXPOSURE VERSION 2

A Computer Model for Analyzing the
Effects of Indoor Air Pollutant
Sources on Individual Exposure

Prepared for

Office of Environmental Engineering
and Technology Demonstration

Prepared by

Air and Energy Engineering Research
Laboratory
Research Triangle Park NC 27711

SECTION 3 MODEL VERIFICATION

Considerable research has been conducted to verify the model and to validate the approach of using chamber emission factors to predict the pollution concentrations. The bulk of the verification experiments have been conducted in the EPA test house. Several of these experiments are discussed in this section of the report.

The test house is a typical three bedroom ranch style house. The house is unoccupied and unfurnished. The floor plan for the test house is shown in Figure 4.

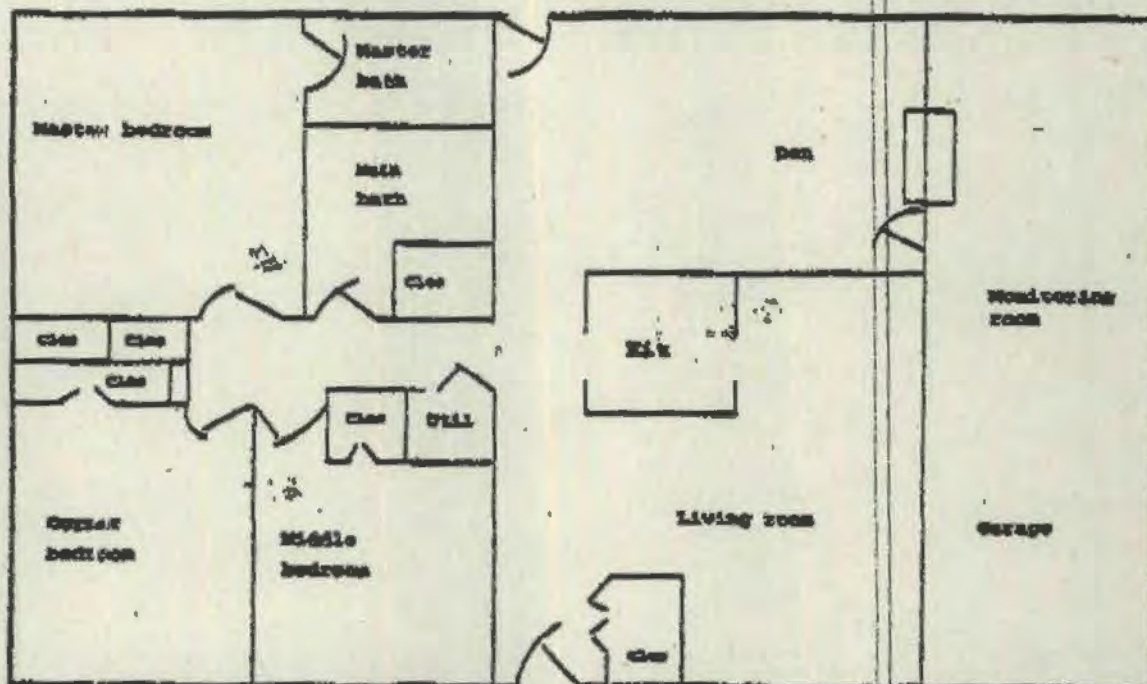


Figure 4. Floor plan of IAQ test house.

The house has central air conditioning and a natural gas central heating system. Exhaust fans are provided in the main bathroom and for the kitchen stove hood. The monitoring room is isolated from the rest of the house and is not considered in any modeling.

Because the den, kitchen, and living room are not separated by continuous walls, they can be combined into one large room for modeling. Also the bedroom closets can be considered as part of the bedrooms. Thus for most situations the test house is modeled as a seven room house. The important characteristics of the various rooms are given in Table III.

Table III. Model parameters for various rooms in the IAQ test house.

Room	Volume m^3	Floor Area m^2	Wall Area m^2	HVAC Flow m^3/h
Den/Kit/LR	150	62.5	81	830
Hall	12	5	2	1760
Middle bedr	34	14	27	125
Corner bedr	33	14	27	300
Master bedr	42	18	36	325
Master bath	10	4	8	60
Main bath	12	5	7	120

Note that HVAC flow for hall is return air all others are supply. Values are based on actual measurements.

Test house air flows

A set of experiments was conducted to better define the air flows in the test house and to determine the reasonableness of the values used in the model. During these experiments the air handling system air flows were measured. Flow visualization studies to determine the nature of the in-room and room-to-room mixing were conducted with neutral density balloons and with neutral density helium bubbles.

Air flow was initially measured in conjunction with experiments on the impact of moth crystals on IAQ. The air conditioning vents in the middle bedroom were closed during these experiments. Thus the air flows for the moth crystal experiment were different from the air flows in other experiments where the air conditioning vents in all rooms were open. The air-handling-system-measured flows for the moth crystal experiments are shown in Table IV. Air flows for other experiments are as given in Table III.

The balloon and bubble experiments showed that, even with the air handling system on, considerable mixing existed between rooms. These experiments also indicated a substantial air flow into and out from the corner bedroom closet even when the closet door was closed. Finally the visualization studies indicated flow between the

Table IV. Measured air flows in test house for moth crystal experiments.

Room	Measured Air Flow, m^3/h
Den/Kit/LR	679
Middle bedroom	38
Corner bedroom	278
Master bedroom	280

corner bedroom closet and the hallway and between the corner bedroom closet and the master bedroom.

Hot wire anemometer measurements were made of the air flow velocities through the cracks around the closet door. These measurements showed air flow into and out of the closet of between 4 and 9 m^3/h .

Qualitative experiments were conducted with a hot-wire anemometer to determine the impact of moving people on the airflows in the test house. These experiments indicated that the movement of people in the test house increased the air flow between rooms.

Experiments were also conducted to determine the room-to-room air flows when the air handler was off. These experiments showed that the room-to-room air flows were not much less than the room-to-room air flows with the air handler on.

Experiments to determine the effect of closing doors on air movement in the house were also conducted. These experiments showed that closing a door between a room and the hall resulted in a slight reduction in the air flow between the hall and the room. The reduction did not have significant impact on pollutant transport into or out of the room with the closed door.

General characteristics of air flow in the test house are:

1. When the air handler fan is on, the dominant flows, with all air conditioning vents open, are as given in Table III. However, even when the air handler is on, there are significant flows from the hall into each room and from the corner bedroom into the master bedroom. Note that these flows are moving against the dominant air-handler-driven flows.

2. When the air handler is off, there is considerable air movement back and forth between the hall and the various rooms in the house.

Blower door and tracer gas studies determined the air exchange between the house and the outdoors. These experiments covered a wide range of conditions of house operation (e.g., air handler on/off, windows open/closed) and a range of temperature differences between indoors and outdoors. In addition to these air-exchange-specific measurements, air exchange measurements are routinely conducted as part of each experiment conducted in the test house. For most of the year the air exchange between the house and the outdoors ranges from 0.3 to 0.5 ACH. For some experiments conducted in the spring, air exchange rates between 0.2 and 0.3 ACH were measured.

Air movement observations using neutral density balloons were made in an occupied house with the air handler off and with the air handler operating in the normal air conditioning cycle. These observations showed that:

1. When the air handler was on, room-to-room air flows were dominated by the air handler flows; however, room-to-room air flows counter to the dominant air flow were observed. These air flows were governed by large eddies.
2. When the air handler was off, room-to-room air flows were governed by large eddies and there was no dominant direction of air flow.
3. When the air handler was off or on, the room-to-room air flows were enhanced by the movement of people between rooms.

Whenever possible air flows should be determined by direct observation instead of by tracer gas measurements. The use of tracer gas measurements introduces circular logic into the model verification process. When tracer gas measurements are made, a model similar to the model being verified is used to estimate the air flows from the tracer concentration measurements. Then these air flows are used in a model to estimate pollutant concentrations. Even though the models may not be identical, the basic assumptions used in the various models are essentially the same.

Additional house characterization tests were conducted and are reported by Jackson et al. (1987).

Verification experiments

Moth cakes

Five moth cakes were placed in the corner bedroom closet of the test house. The moth cakes were laid on the shelves, providing an area for emission of 570 cm^2 . The air conditioning system operated continuously for the entire experiment. The test house temperature was maintained at 25°C . The relative humidity was $50 \pm 10\%$ throughout the test. The p-dichlorobenzene emission rate from moth cakes as determined by Nelms et al. (1987) was $1.4 \text{ mg/cm}^2\text{-h}$. The actual amount of p-dichlorobenzene emitted was determined by weighing the moth cakes before they were placed in the closet and after they were removed from the closet. The emission rate calculated from the weight loss was $1.36 \text{ mg/cm}^2\text{-h}$. Input data for the moth cake experiment are given in Table V. The rate to the sink is based on the diffusion coefficient of p-dichlorobenzene. The sink desorption constant is based on analysis of test house and small chamber data on sinks.

P-dichlorobenzene concentrations were measured in the closet, in the corner bedroom, in the master bedroom, and in the den. Two sets of p-dichlorobenzene measurements were made. One set of measurements was made by collecting samples in airtight syringes. The syringe samples were then injected directly into a gas chromatograph (GC) with an electron capture detector (ECD). The second set of samples was collected by adsorbing samples on Tenax. The Tenax was desorbed and the resulting gas was analyzed with the same GC ECD system used to analyze the direct injection samples. The measurements were made once a day for 4 days. The first measurement was made 3 days after the moth crystals were placed in the closet. The moth crystals were removed from the closet after 10 days and p-dichlorobenzene measurements were made for an additional 4 days. Clayton et al. (1988), Tichenor et al. (1990).

Comparisons of the model predictions and the measured p-dichlorobenzene concentrations are given in Figure 5. Note that the agreement between predicted and measured concentrations is good. The impact of the sinks on the p-dichlorobenzene concentration in the house is of special interest. A mass balance analysis of the p-dichlorobenzene test house data that neglects sinks can account for about 60% of the total mass emitted. The missing mass is that mass that is collected by the sinks, Tichenor et al. (1990). The sinks reduce the concentration by about 50% during the time that the moth crystals are in the test house.

The sinks are able to maintain a moderately high p-dichlorobenzene concentration in the test house for the entire experiment. In fact, p-dichlorobenzene is still detectable in the test house over 2 years after the end of the experiment.

Table V. Model input for analysis of moth crystal experiment.

Source strength 1.4 mg/cm²/h from Nelms et al.(1987)

Air exchange with outdoors 0.35 ACH (SF6 data)

Air exchange between closet and corner bedroom 8 m³/h (hot wire measurement)

Air circulation to air handling system as measured

All air flow to air handling system is from hallway

Air exchange with outdoors is evenly divided between rooms

Sink k_1 = 0.2 m/h

Sink k_2 = 0.001/h

The experimental data and the model predictions show that the small chamber emission factors for p-dichlorobenzene can be used with the model to estimate p-dichlorobenzene concentrations in a building.

CHEMICAL NAME/PESTICIDE CHEMICAL CODE (PCC)
REQUEST FORM

CR#: 96-0278

REQUESTOR NAME: TICE, John T. REQUEST DATE: 5/29/96
TEL: (703) 308-8295 ORG.: BPPD ROOM: 5B MAIL CODE: 7501-W
(DIV./BR./SEC.)

CSF ATTACHED:

- ☒ YES If CSF is attached complete Item A and the chemical name in Item B.
☐ NO If CSF is not attached complete Items A through C.

A. INFORMATION REQUIRED:

✓ Check Applicable Category

- ☐ Provide PCC and Tolerance Exemption Status For Food-Use Inert Ingredient(s)
☐ Provide PCC for Non-Food Use Inert Ingredient (s)
☒ Provide PCC for Active Ingredient(s)
☐ Provide PCC for Dye
☒ Determine if Fragrance is Acceptable for Use in Formulation
☐ Other (Describe): _____

B. INGREDIENT INFORMATION:

Ingredient No. 1: IS Fragrance known to us?

Chem. Name: Fragrance

Trade Name: _____

CAS Reg. No.: NA

Ingredient No. 3: MADE BY:

Chem. Name: S.C. JOHNSON & SONS

Trade Name: _____

CAS Reg. No.: _____

Ingredient No. 2: PC CODE/ACTIVE INGREDIENT

Chem. Name: LAVANDIN OIL

Trade Name: _____

CAS Reg. No.: 8022-15-9

Ingredient No. 4:

Chem. Name: _____

Trade Name: _____

CAS Reg. No.: _____

C. PESTICIDE PRODUCT INFORMATION:

EPA Reg. No./File Symbol: 4822-ULIN Product Name: _____

Registrant: _____ Food-Use Pesticide: ☐ YES ☐ NO

Percent in Formulation (For Fragrance/Dyes only): _____

INFORMATION REPORTED:

Ingredient No. 1: 128874

PCC: _____

TOL STATUS: _____

OTHER INF.: It is in the system

Ingredient No. 3:

PCC: _____

TOL STATUS: _____

OTHER INF.: _____

Completed By: LINDA FAN

Ingredient No. 2: 040500

PCC: _____

TOL STATUS: _____

OTHER INF.: _____

Ingredient No. 4:

PCC: _____

TOL STATUS: _____

OTHER INF.: _____

Date Completed: 05/30/96

12 April 87/1

Product ingredient source information may be entitled to confidential treatment

7/15/96



Worldwide Consumer Products
Research, Development & Engineering

FACSIMILE TRANSMISSION SHEET

TO: ATTENTION: John Tice
COMPANY: EPA - BPPD
FACSIMILE PHONE NO: (703) 308-7026

NUMBER OF PAGES: 3
(Includes Transmission Sheet)

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FROM: Ledie K. Lake DATE: 7/15/96
Regulatory Affairs & Registration Group

MESSAGE:

John:

Attached are data matrices w/MRIDs &

Waiver rationale for:

1) Lavandin oil (TGAI)

I did not include the commercial use history of Lavandin oil (spices, extracts, meat flavorings, etc.), GRAS status or FDA approved uses as part of the waiver rationale. However, it could very well be used as part of the rationale behind NOT conducting genotox, immune, and longer term studies.

Please call me @ (414) 260-2955 if ?.

If there are problems with this transmission, please telephone (414) 260-2622
OR Fax us at (414) 260-4716. Thank you.

Thx!
LK

105

40 CFR 158.690 Toxicology Data Matrix - Lavandin Oil (TGAI)

Guideline Requirement	Study Type	EFRA Toxicity Category	Rationale for Waiver / MRID for bridgeable data
Tier I (81-1) 152-10	Acute oral LD50	Category IV (a)	MRID # to be assigned
(81-2) 152-11	Acute dermal LD50	Waived	Negligible exposure - EP does not involve skin contact
(81-3) 152-12	Acute inhalation LC50	Waived	Negligible exposure - air sampling data confirms de minimis exposure to EP components (MRID # 43806802)
(81-4) 152-13	Primary eye irritation	Category III (EP)	43765301
(81-5) 152-14	Primary dermal irritation	Category IV (a)	MRID # to be assigned
152-15	Hypersensitivity study	Not a sensitizer (a)	MRID # to be assigned
152-16	Hypersensitivity incidents	N/A	All incidents will be reported, if they occur
152-17	Genotoxicity	Waived	Negligible exposure
152-18	Immune Response	Waived	Negligible exposure
152-20	90-day feeding (1 spp.)	Waived	Negligible exposure - pesticidal use does not result in repeated oral exposure
152-21	90-day dermal (1 spp.)	Waived	Negligible exposure - pesticidal use does not result in repeated skin contact
152-22	90-day inhalation (1 spp.)	Waived	Negligible exposure - pesticidal use does not result in repeated inhalation exposure at a toxic concentration
152-23	Teratogenicity	Waived	Negligible exposure to female humans / Does not require a tolerance
Tier II 152-19	Mammalian mutagenicity	Waived	N/A Not required in Tier I
152-24	Immune response	Waived	N/A Not required in Tier I
Tier III 152-69	Chronic exposure	Waived	Use pattern does not involve chronic exposure
152-29	Oncogenicity	Waived	Negligible exposure - Relevant Tier I/II tests not required

(a) Flavor and Extract Manufacturer's Association (FEMA) Monograph No. 2618 on Lavandin Oil (*Lavandula Hybrida*).

Product ingredient source information may be entitled to confidential treatment

7/9/96



Biopesticides and
Pollution
Prevention
Division

FAX

DATE: July 9, 1996

NUMBER OF PAGES: 3

TO: Ms. Leslie Lake
S.C. Johnson & Son, Inc.
Fax 414-260-4716

FROM: John Tice 
US Environmental Protection Agency.
Office of Pesticide Programs
Biopesticides & Pollution Prevention Division (7501W)
401 M St, S.W., Washington, D.C. 20460
Phone (FAX 703-308-7026)
Email: Tice.John@epamail.epa.gov

Please find the results of my label review below. The following requirements will be incorporated into your notice of registration for Mothprofer 5, EPA Reg No. 4822-UUN.

Please let me know if these requirements are contradict our discussions or if you have any questions.

1. A stamped copy of the label is enclosed for your records. (Label received 4/26/96)
2. Change the label by revising the EPA Registration Number to read, "EPA Reg. No. 4822-440" .
3. The following information must appear on each dispenser/sachet after it has been opened:
- Product Name, - Ingredient Statement, - Registration Number, - "Keep out of reach of children", - Signal Word (CAUTION), - Referral Statement ("see [box] for detailed instructions"), - Company name and address.
4. Submit five copies of the final printed label for the record.

CHEMICAL NAME/PESTICIDE CHEMICAL CODE (PCC)
REQUEST FORM*

CR#: 96-0284

REQUESTOR NAME: Tice, John T. REQUEST DATE: 6/3/96
TEL: (705) 305-8195 ORG.: BPPD ROOM: 5 MAIL CODE: 7501-4
(DIV./BR./SEC.)

CSF ATTACHED:

- ☒ YES If CSF is attached complete Item A and the chemical name in Item B.
☐ NO If CSF is not attached complete Items A through C.

A. INFORMATION REQUIRED:

✓ Check Applicable Category

- ☐ Provide PCC and Tolerance Exemption Status For Food-Use Inert Ingredient(s)
☐ Provide PCC for Non-Food Use Inert Ingredient (s)
☐ Provide PCC for Active Ingredient(s)
☐ Provide PCC for Dye
☐ Determine if Fragrance is Acceptable for Use in Formulation
☒ Other (Describe): Provide PCC code for The [redacted] Fragrance Provided.

NOTE THAT LAVANDIN OIL IS THE Active Ingredient.

B. INGREDIENT INFORMATION:

Please Identify Ingredients (above line) That are active ingredients

Ingredient No. 1:

Chem. Name: [redacted]

Trade Name: [redacted]

CAS Reg. No.: [redacted]

Ingredient No. 2:

Chem. Name: [redacted]

Trade Name: [redacted]

CAS Reg. No.: [redacted]

Ingredient No. 3:

Chem. Name: [redacted]

Trade Name: [redacted]

CAS Reg. No.: [redacted]

Ingredient No. 4:

Chem. Name: [redacted]

Trade Name: [redacted]

CAS Reg. No.: [redacted]

C. PESTICIDE PRODUCT INFORMATION:

EPA Reg. No./File Symbol: [redacted] Product Name: [redacted]

Registrant: [redacted]

Food-Use Pesticide: ☐ YES ☐ NO

Percent in Formulation (For Fragrance/Dyes only): [redacted]

INFORMATION REPORTED:

Ingredient No. 1:

PCC: [redacted]

TOL. STATUS: [redacted]

OTHER INF.: [redacted]

Ingredient No. 2:

PCC: [redacted]

TOL. STATUS: [redacted]

OTHER INF.: [redacted]

Ingredient No. 3:

PCC: [redacted]

TOL. STATUS: [redacted]

OTHER INF.: [redacted]

Ingredient No. 4:

PCC: [redacted]

TOL. STATUS: [redacted]

OTHER INF.: [redacted]

Completed By: LINDA

EDN

Date Completed: 06/07/96

12 April 97



Worldwide Consumer Products
Research, Development & Engineering

FACSIMILE TRANSMISSION SHEET

TO: ATTENTION: John Tice - Regulatory Action Leader - BPPD
COMPANY: EPA
FACSIMILE PHONE NO: (703) 308-7026

NUMBER OF PAGES: 13
(Includes Transmission Sheet)

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FROM: Leslie K. Lake DATE: 6/4/96
Regulatory Affairs & Registration Group

MESSAGE:

John: Following you'll find:

(1) Results from "One Gallon Jar Mothproofer Screening Test"

(2) Discussion of [REDACTED] NTP data

(3) RIFM Monographs for [REDACTED]

Best Regards,

Leslie

If there are problems with this transmission, please telephone (414) 260-2822
OR Fax us at (414) 260-4718. Thank you.

Product ingredient source information may be entitled to confidential treatment
Inert ingredient information may be entitled to confidential treatment



Worldwide Consumer Products
Research, Development & Engineering

FACSIMILE TRANSMISSION SHEET

TO: ATTENTION: John Tice, EPA-BPPD
COMPANY: _____
FACSIMILE PHONE NO: (703) 308-7026

NUMBER OF PAGES: 5
(includes Transmission Sheet)

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FROM: Lodie Lake DATE: 6/4/96
Regulatory Affairs & Registration Group

MESSAGE:

John: RIFM monograph as requested.

Best Regards,
Lodie

Screening Data &
RIFM monograph.

If there are problems with this transmission, please telephone (414) 260-2622
OR Fax us at (414) 260-4716. Thank you.



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236
Phone: (414) 631-2000

VIA FEDERAL EXPRESS

April 22, 1996

Mr. John Tice
Regulatory Action Leader
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Mr. Tice:

RE: Off! Moth Proofer 5, EPA Reg. No. 4822-UUN

In response to your conversation with Leslie, I am enclosing (5) five copies of the revised label for the above mentioned product for your review.

We have added the following claims:

Pleasant protection for your clothes
Lasts (up to) (two) (three) (four) (months) (season long) (for one season).
Protects clothes from moth damage for (up to) (two) (three) (four) (months) (season long)
(for one season)

We have added under "Directions for Use:"

1. (Remove backing (cardboard) label from unit using pull tab.)
3. Replace stored units every season.

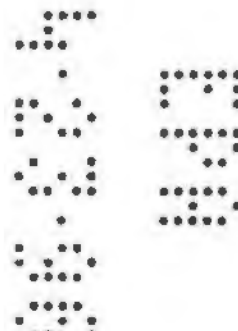
If you have any questions regarding this label please call me at 414-260-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist

Enclosures



FRONT PANEL

OFF! Moth Proofer 5

New

(Fresh) (Pleasant) Lavender Scent

Outdoor Fresh Scent

Spring Fresh Scent

Spring Breeze Scent

(Pleasant) (Fresh) Scent

(Country) Fresh Scent

Soft Sachet Scent

Floral Bouquet Scent

Sunshine (Fresh) Scent

(Pleasant) (Country) Spice Scent

(Fresh) Herbal Scent

(Effectively) controls moth problems with a pleasant scent

No unpleasant mothball smell

No harsh chemicals

No need to dry clean (or) (air out your) clothes (garments) after storage (use)

Protects clothes from moth damage

Keeps moths off clothes

Effective for one season

Lavender Formula

Protects clothes from (moth) damage for one (two) (three) (four) months (season long) (for one season)

Freshens closets (drawers) while protecting clothes from (moth) damage

Repels (kills) (controls) (moths) (moth eggs and larvae) (pupae) (which cause damage to clothes)

Easy to use

No mess

Convenient to use

Unique (clothes) (garment) protection (with a pleasant scent)

Not only protects (your) clothes, it freshens (your) closet (drawers)

Protects (your) clothes from moths (damage) with a (natural), fresh (pleasant) (lavender) scent

Pleasant protection for your clothes

Lasts (up to) (two) (three) (four) (months) (season long) (for one season)

Protects clothes from moth damage for (up to) (two) (three) (four) (months) (season long) (for one season)

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Contains (number) (name) (hangers) (units) (fresheners)

Net Contents: contains 2 units

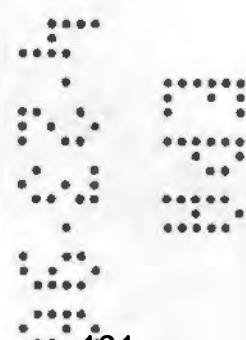
net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back

K:commonic\jp\mz:moth8



BACK PANEL

OFF! Moth Proofer 5

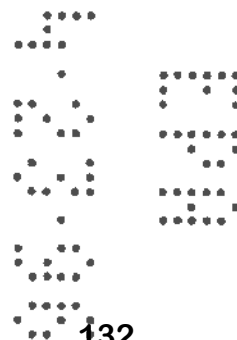
DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. (Separate the two units.) *(Remove backing (cardboard) label from unit using pull tab.)*
Slowly remove foil label from the (fragrance) cartridge using peel tab. Do not remove or puncture white (clear) film protecting (colored) (fragrance) concentrate (gel). This film controls the release of concentrated (freshening) (protection) ingredients. (Insert cartridge into holder unit.)
2. This product can be placed inside drawers and storage boxes or hung in closets. Use one unit in smaller (average size) closets, drawers or boxes, two in larger closets, drawers or boxes (and close tightly). **Important:** For maximum effectiveness, closets, drawers or boxes must be kept as air tight as possible. Dry clean clothes (garments) (fabrics) before storing (Clean clothes (garments) (fabrics) before storing).
3. When the (fragrance) concentrate (gel) dries and cracks (turns to powder), this signals replacement time (for the cartridge). (Replace all (name) (units) every (one) (two) (three) (four) months (season). *Replace stored units every season.*

STORAGE: Store in a cool area away from children.

DISPOSAL: Wrap and put in trash collection.



OFF! Moth Proofer 5

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT: IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

Questions? Comments? Call 800-558-5252 weekdays, 9-9 Eastern Time or Write Helen Johnson © 1996 S. C. Johnson & Son, Inc. Racine, WI 53403-2236 U.S.A. All Rights Reserved.

EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

Unit Labeling

OFF! Moth Proofer 5

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Net Contents .11 oz. per unit

Keep Out Of Reach Of Children

CAUTION

See outer package for additional precautionary statements and complete directions

EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

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FRONT PANEL

OFF! Moth Proofer 5

New

(Fresh) (Pleasant) Lavender Scent

Outdoor Fresh Scent

Spring Fresh Scent

Spring Breeze Scent

(Pleasant) (Fresh) Scent

(Country) Fresh Scent

Soft Sachet Scent

Floral Bouquet Scent

Sunshine (Fresh) Scent

(Pleasant) (Country) Spice Scent

(Fresh) Herbal Scent

(Effectively) controls moth problems with a pleasant scent

No unpleasant mothball smell

No harsh chemicals

No need to dry clean (or) (air out your) clothes (garments) after storage (use)

Protects clothes from moth damage

Keeps moths off clothes

Effective for one season

Lavender Formula

Protects clothes from (moth) damage for one (two) (three) (four) months (season long) (for one season)

Freshens closets (drawers) while protecting clothes from (moth) damage

Repels (kills) (controls) (moths) (moth eggs and larvae) (pupae) (which cause damage to clothes)

Easy to use

No mess

Convenient to use

Unique (clothes) (garment) protection (with a pleasant scent)

Not only protects (your) clothes, it freshens (your) closet (drawers)

Protects (your) clothes from moths (damage) with a (natural), fresh (pleasant) (lavender) scent

Pleasant protection for your clothes

Lasts (up to) (two) (three) (four) (months) (season long) (for one season)

Protects clothes from moth damage for (up to) (two) (three) (four) (months) (season long) (for one season)

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Contains (number) (name) (hangers) (units) (fresheners)

Net Contents: contains 2 units

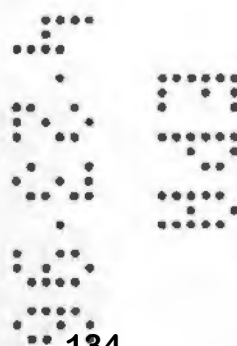
net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back

K:\common\ic\jpl\mz\moth8



BACK PANEL

OFF! Moth Proofer 5

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. (Separate the two units.) *(Remove backing (cardboard) label from unit using pull tab.)*
Slowly remove foil label from the (fragrance) cartridge using peel tab. Do not remove or puncture white (clear) film protecting (colored) (fragrance) concentrate (gel). This film controls the release of concentrated (freshening) (protection) ingredients. (Insert cartridge into holder unit.)
2. This product can be placed inside drawers and storage boxes or hung in closets. Use one unit in smaller (average size) closets, drawers or boxes, two in larger closets, drawers or boxes (and close tightly). **Important:** For maximum effectiveness, closets, drawers or boxes must be kept as air tight as possible. Dry clean clothes (garments) (fabrics) before storing (Clean clothes (garments) (fabrics) before storing).
3. When the (fragrance) concentrate (gel) dries and cracks (turns to powder), this signals replacement time (for the cartridge). (Replace all (name) (units) every (one) (two) (three) (four) months (season). *Replace stored units every season.*

STORAGE: Store in a cool area away from children.

DISPOSAL: Wrap and put in trash collection.

OFF! Moth Proofer 5

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT: IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

Questions? Comments? Call 800-558-5252 weekdays, 9-9 Eastern Time or Write Helen Johnson © 1996 S. C. Johnson & Son, Inc. Racine, WI 53403-2236 U.S.A. All Rights Reserved.

EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

Unit Labeling

OFF! Moth Proofer 5

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Net Contents .11 oz. per unit

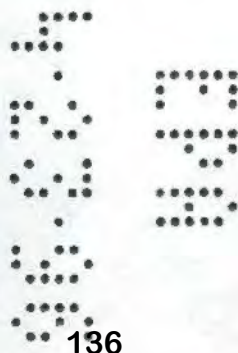
Keep Out Of Reach Of Children

CAUTION

See outer package for additional precautionary statements and complete directions

EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

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S. C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236
Phone: (414) 260-2000

John Tice, Regulatory Action Leader
Biopesticides and Pollution Prevention
Division (BPPD)
U.S. Environmental Protection Agency
Office of Pesticide Programs
2800 Jefferson Davis Hwy.
Arlington, VA 22202

February 29, 1996

Dear John:

Enclosed is a sample of the membrane technology employed for Off! mothproofer gels.
If you have any questions, please give me a call at (414)260-2955.

Sincerely,

Leslie K. Lake
Project Manager,
Strategic Actions

LKL/cm
0281kl



S. C. Johnson & Son, Inc.

Racine, Wisconsin U.S.A. 53403-2236

Worldwide Consumer Products
Research, Development & Engineering

FACSIMILE TRANSMISSION SHEET

TO: ATTENTION: John Tice
COMPANY: U.S. EPA
FACSIMILE PHONE NO: 703-308-7026NUMBER OF PAGES: 5
(includes Transmission Sheet)

The information contained in this communication is **confidential**, and intended only for the use of the addressee. Unauthorized use, disclosure or copying is strictly prohibited. If you have received this communication in error, please immediately notify us, collect, at the contact number below, so that we can arrange for retrieval of the original document at our cost. Thank you.

FROM: Gene Vander Zee DATE: 2/28/96
Regulatory Affairs & Registration Group

MESSAGE:

I will be sending you a hard copy
of this label to you today via Federal
Express.

If there are problems with this transmission, please telephone (414) 260-2622
OR Fax us at (414) 260-4716. Thank you.



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236
Phone: (414) 631-2000

VIA FEDERAL EXPRESS

February 28, 1996

Mr. John Tice
Regulatory Action Leader
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Mr. Tice:

RE: Off! Moth Proofer 5, EPA Reg. No. 4822-UUN

In response to your conversation with Lealie Lake, I am enclosing (5) five copies of the revised label for the above-mentioned product for your review.

We have added under "Directions for Use," Remove backing (cardboard) label from unit using pull tab.

If you have any questions regarding this label please call me at 414-260-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist

Enclosures

<label to EPA 2/96, *Change is in italics*>

OFF! Moth Proofer 5

New

(Fresh) (Pleasant) Lavender Scent

Outdoor Fresh Scent

Spring Fresh Scent

Spring Breeze Scent

(Pleasant) (Fresh) Scent

(Country) Fresh Scent

Soft Sachet Scent

Floral Bouquet Scent

Sunshine (Fresh) Scent

(Pleasant) (Country) Spice Scent

(Fresh) Herbal Scent

(Effectively) controls moth problems with a pleasant scent

No unpleasant mothball smell

No harsh chemicals

No need to dry clean (or) (air out your) clothes (garments) after storage (use)

Protects clothes from moth damage

Keeps moths off clothes

Effective for one season

Lavender Formula

Protects clothes from (moth) damage for one (two) (three) (four) months (season long) (for one season)

Freshens closets (drawers) while protecting clothes from (moth) damage

Repels (kills) (controls) (moths) (moth eggs and larvae) (pupae) (which cause damage to clothes)

Easy to use

No mess

Convenient to use

Unique (clothes) (garment) protection (with a pleasant scent)

Not only protects (your) clothes, it freshens (your) closet (drawers)

Protects (your) clothes from moths (damage) with a (natural), fresh (pleasant) (lavender) scent

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Contains (number) (name) (hangers) (units) (fresheners)

Net Contents: contains 2 units

net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN**CAUTION**

See additional precautionary statements on back

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. (Separate the two units.) *(Remove backing (cardboard) label from unit using pull tab.)* Slowly remove foil label from the (fragrance) cartridge using peel tab. Do not remove or puncture white (clear) film protecting (colored) (fragrance) concentrate (gel). This film controls the release of concentrated (freshening) (protection) ingredients. (Insert cartridge into holder unit.)

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3. When the (fragrance) concentrate (gel) dries and cracks (turns to powder), this signals replacement time (for the cartridge). (Replace all (name) (units) every (one) (two) (three) (four) months (season)).

STORAGE: Store in a cool area away from children.**DISPOSAL:** Wrap and put in trash collection.

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT: IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

Questions? Comments? Call 800-558-5252 weekdays, 9-9 Eastern Time or Write Helen Johnson © 1994 S. C. Johnson & Son, Inc., Racine, WI 53403-2236 U.S.A. All Rights Reserved.

EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

Unit Labeling

OFF! Moth Proofer 5

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Net Contents .11 oz. per unit

Keep Out Of Reach Of Children

CAUTION

See outer package for additional precautionary statements and complete directions

EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

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S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236
Phone: (414) 631-2000

RECEIVED
3/5/96
BPPD

VIA FEDERAL EXPRESS

February 28, 1996

Mr. John Tice
Regulatory Action Leader
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202



Dear Mr. Tice:

RE: Off! Moth Proofer 5, EPA Reg. No. 4822-UUN

In response to your conversation with Leslie Lake, I am enclosing (5) five copies of the revised label for the above-mentioned product for your review.

We have added under "Directions for Use," Remove backing (cardboard) label from unit using pull tab.

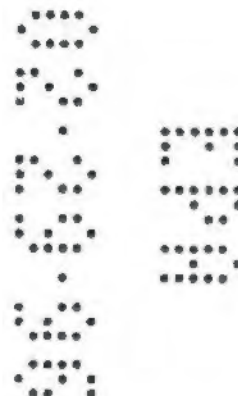
If you have any questions regarding this label please call me at 414-260-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist

Enclosures



<label to EPA 2/96, *Change is in italics*>

OFF! Moth Proofer 5

New

(Fresh) (Pleasant) Lavender Scent

Outdoor Fresh Scent

Spring Fresh Scent

Spring Breeze Scent

(Pleasant) (Fresh) Scent

(Country) Fresh Scent

Soft Sachet Scent

Floral Bouquet Scent

Sunshine (Fresh) Scent

(Pleasant) (Country) Spice Scent

(Fresh) Herbal Scent

(Effectively) controls moth problems with a pleasant scent

No unpleasant mothball smell

No harsh chemicals

No need to dry clean (or) (air out your) clothes (garments) after storage (use)

Protects clothes from moth damage

Keeps moths off clothes

Effective for one season

Lavender Formula

Protects clothes from (moth) damage for one (two) (three) (four) months (season long) (for one season)

Freshens closets (drawers) while protecting clothes from (moth) damage

Repels (kills) (controls) (moths) (moth eggs and larvae) (pupae) (which cause damage to clothes)

Easy to use

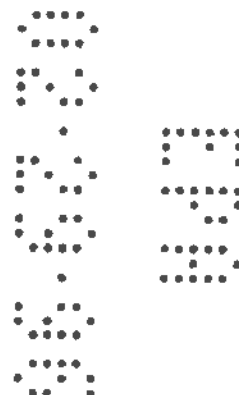
No mess

Convenient to use

Unique (clothes) (garment) protection (with a pleasant scent)

Not only protects (your) clothes, it freshens (your) closet (drawers)

Protects (your) clothes from moths (damage) with a (natural), fresh (pleasant) (lavender) scent



Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Contains (number) (name) (hangers) (units) (fresheners)

Net Contents: contains 2 units

net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back

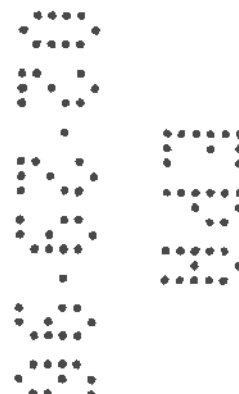
DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. (Separate the two units.) *(Remove backing (cardboard) label from unit using pull tab.)* Slowly remove foil label from the (fragrance) cartridge using peel tab. Do not remove or puncture white (clear) film protecting (colored) (fragrance) concentrate (gel). This film controls the release of concentrated (freshening) (protection) ingredients. (Insert cartridge into holder unit.)
2. This product can be placed inside drawers and storage boxes or hung in closets. Use one unit in smaller (average size) closets, drawers or boxes, two in larger closets, drawers or boxes (and close tightly). Important: For maximum effectiveness, closets, drawers or boxes must be kept as air tight as possible. Dry clean clothes (garments) (fabrics) before storing (Clean clothes (garments) (fabrics) before storing).
3. When the (fragrance) concentrate (gel) dries and cracks (turns to powder), this signals replacement time (for the cartridge). (Replace all (name) (units) every (one) (two) (three) (four) months (season)).

STORAGE: Store in a cool area away from children.

DISPOSAL: Wrap and put in trash collection.



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT: IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

Questions? Comments? Call 800-558-5252 weekdays, 9-9 Eastern Time or Write Helen Johnson © 1994 S. C. Johnson & Son, Inc., Racine, WI 53403-2236 U.S.A. All Rights Reserved.

EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

Unit Labeling

OFF! Moth Proofer 5

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Net Contents .11 oz. per unit

Keep Out Of Reach Of Children

CAUTION

See outer package for additional precautionary statements and complete directions

EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

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Product Safety, Toxicology and
Environmental Assessment

FACSIMILE TRANSMISSION SHEET

TO: COMPANY EPA-BPPD → John Tice
ATTENTION ↑
FACSIMILE PHONE NO.: (800) (703) 308-7026
NUMBER OF PAGES: (Includes Transmission Sheet) 4

FROM: Leslie K. Lake **DATE:** 2/26/96
FAX: (414) 260-3752

COMMENTS:

John: Per my voice mail message...

The change (addition) to the label for Off! Mothproof
5 is: page 2, DIRECTIONS FOR USE ... / new
1. (Separate the two units.) (Remove backing
(cardboard) label from unit and using
pull tab.) Slowly remove...

We'll submit this asap so you don't have to see this more times
than necessary

The information contained in this communication is confidential, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying is strictly prohibited. If you have received this communication in error, please immediately notify us, collect, at the contact number below, so that we can arrange for retrieval of the original document at our cost. Thank you.

Thy
Leslie

**If there are problems with this transmission, please call Debbie Vance
at (414) 260-4703.**

FAX Form/dv

<label to EPA 2/96, *Change is in Italics*>

OFF! Moth Proofer 5

New

(Fresh) (Pleasant) Lavender Scent

Outdoor Fresh Scent

Spring Fresh Scent

Spring Breeze Scent

(Pleasant) (Fresh) Scent

(Country) Fresh Scent

Soft Sachet Scent

Floral Bouquet Scent

Sunshine (Fresh) Scent

(Pleasant) (Country) Spice Scent

(Fresh) Herbal Scent

(Effectively) controls moth problems with a pleasant scent

No unpleasant mothball smell

No harsh chemicals

No need to dry clean (or) (air out your) clothes (garments) after storage (use)

Protects clothes from moth damage

Keeps moths off clothes

Effective for one season

Lavender Formula

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Freshens closets (drawers) while protecting clothes from (moth) damage

Repels (kills) (controls) (moths) (moth eggs and larvae) (pupae) (which cause damage to clothes)

Easy to use

No mess

Convenient to use

Unique (clothes) (garment) protection (with a pleasant scent)

Not only protects (your) clothes, it freshens (your) closet (drawers)

Protects (your) clothes from moths (damage) with a (natural), fresh (pleasant) (lavender) scent

mothproofer5/2-96/3pgs

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Contains (number) (name) (hangers) (units) (fresheners)

Net Contents: contains 2 units

net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN**CAUTION**

See additional precautionary statements on back

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. (Separate the two units.) ~~(Remove backing (cardboard) label from unit using pull tab.)~~ Slowly remove foil label from the (fragrance) cartridge using peel tab. Do not remove or puncture white (clear) film protecting (colored) (fragrance) concentrate (gel). This film controls the release of concentrated (freshening) (protection) ingredients. (Insert cartridge into holder unit.)

2. This product can be placed inside drawers and storage boxes or hung in closets. Use one unit in smaller (average size) closets, drawers or boxes, two in larger closets, drawers or boxes (and close tightly). Important: For maximum effectiveness, closets, drawers or boxes must be kept as air tight as possible. Dry clean clothes (garments) (fabrics) before storing (Clean clothes (garments) (fabrics) before storing).

3. When the (fragrance) concentrate (gel) dries and cracks (turns to powder), this signals replacement time (for the cartridge). (Replace all (name) (units) every (one) (two) (three) (four) months (season)).

STORAGE: Store in a cool area away from children.**DISPOSAL:** Wrap and put in trash collection.

mothproofer5/2-96/3pgs

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT: IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

Questions? Comments? Call 800-558-5252 weekdays, 9-9 Eastern Time or Write Helen Johnson © 1994 S. C. Johnson & Son, Inc., Racine, WI 53403-2236 U.S.A. All Rights Reserved.

EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

Unit Labeling**OFF! Moth Proofer 5****Active Ingredient**

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Net Contents .11 oz. per unit

Keep Out Of Reach Of Children

CAUTION

See outer package for additional precautionary statements and complete directions

EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

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mothproofer5/2-96/3pgs

John Lice

7501W

This document will publish in the
FEDERAL REGISTER of 2/5/96.
Approximately 24 hours after
publication, page numbers are
available by calling the Federal
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Please refer to the FRL number at
the top of the first page or the
number at the bottom left corner of
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available in the FRS Office.
(NE Mall G-304).

John A. Richards, Director
Federal Register Staff

2-14-96.
none
Vol 61 #31
APP 5770

ENVIRONMENTAL PROTECTION AGENCY

[OPP-30401; FRL-4994-2]

S. C. Johnson and Son, Inc.; Application to Register a Pesticide Product

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice.

SUMMARY: This notice announces receipt of an application to register a pesticide product containing a new active ingredient not included in any previously registered product pursuant to the provisions of section 3(c)(4) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended.

DATES: Written comments must be submitted by (insert date 30 days after publication in the **Federal Register**).

ADDRESSES: By mail, submit written comments identified by the document control number [OPP-30401] and the file symbol (4822-UUN) to: Public Response and Program Resources Branch, Field Operations Divisions (7506C), Office of Pesticide Programs, Environmental Protection Agency, 401 M St., SW., Washington, DC 20460. In person, bring comments to: Environmental Protection Agency, Rm. 1132, CM #2, 1921 Jefferson Davis Hwy., Arlington, VA.

Comments and data may also be submitted electronically by sending electronic mail (e-mail) to: opp-docket@epamail.epa.gov. Electronic comments must be submitted as an ASCII file avoiding the use of special characters and any form of encryption. Comments and data will be accepted on disks in Wordperfect in 5.1 file format or ASCII file format. All comments and data in electronic form must be identified by the docket number [OPP-30401]. No "Confidential Business Information" (CBI) should be submitted through e-mail. Electronic comments on this notice may be filed online at many Federal Depository Libraries. Additional information on electronic submission can be found below in this document.

Information submitted as a comment concerning this notice may be claimed confidential by marking any part or all of that information as "Confidential Business Information" (CBI). Information so marked will not be disclosed except in accordance with procedures set forth in 40 CFR part 2. A copy of the comment that does not contain CBI must be submitted for inclusion in the public record. Information not marked confidential may be disclosed publicly by EPA without prior notice. All written comments will be available for public inspection in Rm. 1132 at the address given above, from 8 a.m. to 4:30 p.m., Monday through Friday, excluding holidays.

FOR FURTHER INFORMATION CONTACT: By mail: John Tice, Biopesticides and Pollution Prevention Division (7501W), Office of Pesticide Programs, Environmental Protection Agency, 401 M St., SW., Washington, DC 20460. Office location and telephone number: Rm. CS51B6, Westfield Building North

2/7/96 FR NOTICE

Tower, 2800 Crystal Drive, Arlington, VA 22202, (703) 308-8295; e-mail: tice.john@epamail.epa.gov.

SUPPLEMENTARY INFORMATION: EPA received an application from S. C. Johnson and Son, Inc., 1525 Howe St., Racine, WI 53403, to register the pesticide product OFF! Moth Proofer 5 (EPA File Symbol 4822-UUN), containing the active ingredient lavandin oil at 11.49 percent, an active ingredient not included in any previously registered product pursuant to the provisions of section 3(c)(4) of FIFRA. The product is classified for general use as a moth repellant to be placed in drawers and closets as a freshner while protecting clothes from moth damage. Notice of receipt of the application does not imply a decision by the Agency on the application.

Notice of approval or denial of an application to register a pesticide product will be announced in the **Federal Register**. The procedure for requesting data will be given in the **Federal Register** if an application is approved.

Comments received within the specified time period will be considered before a final decision is made; comments received after the time specified will be considered only to the extent possible without delaying processing of the application.

A record has been established for this notice under docket number [OPP-30401] (including comments and data submitted electronically as described below). A public version of this record, including printed, paper versions of electronic comments, which does not include any information claimed as CBI, is available for inspection from 8 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The public record is located in Rm. 1132 of the Public Response and Program Resources Branch, Field Operations Division (7506C), Office of Pesticide Programs, Environmental Protection Agency, Crystal Mall #2, 1921 Jefferson Davis Highway, Arlington, VA.

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Written comments filed pursuant to this notice, will be available in the Public Response and Program Resources Branch, Field Operations Division at the address provided from 8 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. It is suggested that persons interested in reviewing the application


file, telephone this office at (703-305-5805), to ensure that the file is available on the date of intended visit.

Authority: 7 U.S.C. 136.

List of Subjects

Environmental protection, Pesticides and pests, Product registration.

Dated: 1-30-96

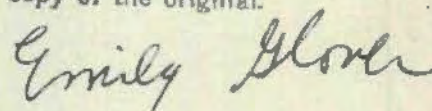


Janet L. Andersen,
Acting Director, Biopesticides and Pollution Prevention Division, Office of Pesticide
Programs.

[FR Doc. 96-????? Filed ??-??-96; 8:45 am]

BILLING CODE 6560-50-F

Certified to be a true
copy of the original.



FEDERAL REGISTER DRAFT INFORMATION SHEET FOR PUBLICATION OF:
(Check applicable item)

- ☒ 1. Application, Register Pest. Product With New Ingredient
- ☐ 2. Application, Registered Pest. Product Entailing a Changed Use Pattern
- ☐ 3. Approval, Application to Register Pest. Product with New A.I.
- ☐ 4. Approval, Application to Register Pest. Product Entailing a Changed Use Pattern

PLEASE PROVIDE THE FOLLOWING INFORMATION

A. Complete Company Name and Address

S.C. Johnson & Son, Inc.

1525 Howe Street

Racine, Wisconsin 53403

B. Product Name: OFF! Moth Proofer 5

C. Type of product (Insecticide/Rodenticide, etc.) Other
Insect Repellant

D. File Symbol/ Registration Number 4822-UUN

E. Chemical Name: Levandin Oil

F. % Active Ingredient: 11.49%

G. Proposed/Approved Classification: General Use

H. Use Pattern: (specify the change)
Moth Repellant

I. Type of Registration/Approval: Full ☒ Conditional ☐

J. Other information you think appropriate for publication purposes:

NOTE: The Divisions' name and director is:

Janet L. Andersen, Acting Director

Biopesticides and Pollution Prevention Division (7501-W)

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ENVIRONMENTAL PROTECTION AGENCY

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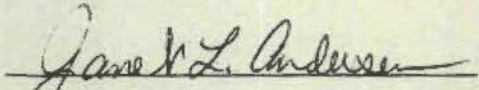
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Authority: 7 U.S.C. 136.

List of Subjects

Environmental protection, Pesticides and pests, Product registration.

Dated: 1-30-96



Acting Director, Biopesticides and Pollution Prevention Division, Office of Pesticide Programs.

[FR Doc. 96-????? Filed ??-??-96; 8:45 am]

BILLING CODE 6560-50-F

ACTION: R TABLEID: REQL USERID: PLNI

*** REQUISITION ACCOUNTING LINE INQUIRY TABLE ***

KEY IS TRANS CODE, REQ NO, LINE NO

TRANS CODE: RQ

REQ NO: 9632JF0009

01-	LINE NO:	001	BFY:	96 97	APPR:	B	RPIO:	20	
	BUDGET ORG:	32N00PT			PE:	B93	LINE AMT:		176.00
	COST ORG:				SITE/PROJ:		CLOSED AMT:		0.00
	BOC:	2413			RPTG CATG:		OBLG AMT:		0.00
	LAST CHG STATUS:				DESCRIPTION:	FRL49942;96P4;OPP30401			
02-	LINE NO:		BFY:		APPR:		RPIO:		
	BUDGET ORG:				PE:		LINE AMT:		
	COST ORG:				SITE/PROJ:		CLOSED AMT:		
	BOC:				RPTG CATG:		OBLG AMT:		
	LAST CHG STATUS:				DESCRIPTION:				
03-	LINE NO:		BFY:		APPR:		RPIO:		
	BUDGET ORG:				PE:		LINE AMT:		
	COST ORG:				SITE/PROJ:		CLOSED AMT:		
	BOC:				RPTG CATG:		OBLG AMT:		
	LAST CHG STATUS:				DESCRIPTION:				

02-*L009 HEADER CHANGE



S C JOHNSON WAX
Inter-Office Memo
RESEARCH SERVICES

Consumer Data

FROM: R. A. Causey *[Signature]*

DATE: November 9, 1995

TO: L. Lake

RE: Project Closet Consumer Placement Test

Leslie, this note will summarize consumer feedback to the Off! Moth Proofer we tested during the June - August timeframe. This feedback was obtained through phone interviews with consumers who used the product for 90 days.

Overall, consumers were very pleased with the product. Following use, over 80% of the participants indicated they'd buy the product if it were available. They also rated the product high on the Overall Liking, Value, and New & Different measures.

Respondents felt the product was efficacious, as most stated it "totally eliminated/controlled" or "significantly reduced" their moth problem. They also gave the product high marks on "Overall Effectiveness" and "Repels Moths".

In fact, respondents rated the product highly in virtually all areas, including "Safe To Use", "For All Types of Clothing", and "Has A Pleasant Fragrance". Importantly, there were no consumers who reported having had an adverse reaction coincidental with use of this product.

Product likes centered primarily around fragrance (e.g., "smells better than other methods"; "pleasant fragrance"), efficacy ("repels/controls moths"), and ease/convenience of use ("easy to use/just hang in closet or put in drawer"). Test participants also liked the product's small size, price, and felt it was safe to use.

Product dislikes were few in number; of nearly 200 household placements, only 20% mentioned something they disliked. Most of these mentions revolved around the fragrance (e.g., "not pleasant"; "not smell as good as other methods"). One individual indicated she had a problem with the fragrance (i.e., it "made her eyes itchy and uncomfortable"), but as we've since learned this individual has a sensitivity to fragrances in general. Another dislike included the perception that the product was not effective.

Leslie, I've attached the supporting data from which this summary is drawn. If, upon further review, there is something unclear or you have additional questions, do not hesitate to give me a call.

Bud.

k/ficare/r40309m3/1



Product Safety, Toxicology and
Environmental Assessment

FACSIMILE TRANSMISSION SHEET

TO: COMPANY EPA- BPPD
ATTENTION Freshteh Toghdol, Ph.D., Chemist
FACSIMILE PHONE NO.: (703) 308 - 7026
NUMBER OF PAGES: 16 (Includes Transmission Sheet)

FROM: Leslie K. Lake DATE: Nov. 9, 1995
FAX: (414) 631-3752

COMMENTS:

Freshteh: Off! Mothproofer 4822-UUN
Here is a summary of the field testing
(consumer placement) conducted for Off!
Mothproofer #5 (4822-UUN).

Please call me if you have any questions —
(414) 631-2955 Best Regards,
Leslie

The information contained in this communication is confidential, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying is strictly prohibited. If you have received this communication in error, please immediately notify us, collect, at the contact number below, so that we can arrange for retrieval of the original document at our cost. Thank you.

**It there are problems with this transmission, please call Debbie Vance
at (414) 631-4703.**

PROJECT CLOSET CONSUMER PLACEMENT TEST

After-Use Results - Summary of Key Measures

- Moth Control Users -

(Moth Control Users)	FOUR WEEK CALLBACK (143)	THREE MONTH CALLBACK (94)
<u>Purchase Intent</u>		
Top Two Box	80.2%	82.0%
<i>Definitely Would Buy</i>	<i>34.5%</i>	<i>41.8%</i>
<i>Probably Would Buy</i>	<i>45.7%</i>	<i>40.1%</i>
<i>Might/Might Not Buy</i>	<i>10.1%</i>	<i>10.8%</i>
<i>Probably Would Not Buy</i>	<i>6.7%</i>	<i>3.4%</i>
<i>Definitely Would Not Buy</i>	<i>3.0%</i>	<i>3.7%</i>
 <u>Mean Like/Dislike Rating (6 Pt.)</u>		
<i>Total</i>	<i>4.5</i>	<i>4.6</i>
 <u>Mean Price/Value Rating (5 Pt.)</u>		
<i>Total</i>	<i>3.8</i>	<i>3.9</i>
 <u>Mean New and Different Rating (5 Pt.)</u>		
<i>Total</i>	<i>3.7</i>	<i>3.7</i>

PROJECT CLOSET CONSUMER PLACEMENT TEST

AFTER-USE RESULTS

Product Likes Following 4 Weeks of Use

FAVORABLE RESPONDENTS (N)	<u>USER</u> (114) %
<u>FRAGRANCE (NET)</u>	<u>76</u>
SMELLS BETTER THAN OTHER METHODS/NO MOTH BALL ODOR	26
PLEASANT FRAGRANCE	15
NO UNPLEASANT ODOR	9
FRESH/CLEAN FRAGRANCE	9
FLORAL/POTPOURRI FRAGRANCE	7
LIGHT /MILD FRAGRANCE/NOT STRONG/HEAVY	6
MILDER FRAGRANCE THAN OTHERS/MOTHBALLS	5
LEAVES PLEASANT SCENT IN CLOSET	5
NO MOTH BALL ODOR ON CLOTHING	5
NO UNPLEASANT ODOR ON CLOTHING	4
<u>EFFECTIVENESS (NET)</u>	<u>57</u>
<u>REPELS MOTHS (SUB-NET)</u>	<u>50</u>
REPELS/CONTROLS MOTHS	31
PROTECTS AGAINST MOTHS/PROTECTS CLOTHES FROM DAMAGE	13
KILLS MOTHS	3
REPELS/CONTROLS MOTHS BETTER THAN OTHER METHODS	0
<u>GENERAL EFFECTIVENESS (SUB-NET)</u>	<u>7</u>
EFFECTIVE/WORKS (UNSPECIFIED)	4
DEODORIZES/FRESHENS THE ROOM/AIR	2
<u>LONG LASTING (SUB-NET)</u>	<u>5</u>
LONG LASTING	3
<u>EASE/CONVENIENCE (NET)</u>	<u>41</u>
EASY/QUICK TO USE/JUST HANG IN CLOSET/PUT IN DRAWER	13
EASY TO INSTALL/HANG/HAS ITS OWN HANGER	13
EASIER TO USE THAN OTHER METHODS	4
LESS MESSY THAN OTHER METHODS	4
READY TO USE/DON'T HAVE TO DO ANYTHING	4
EASY TO ACTIVATE, JUST PULL AWAY FOIL/EASY TO REMOVE TAB	3
<u>PRODUCT FEATURES (NET)</u>	<u>21</u>
LIKE SIZE/SMALL SIZE	8
SELF-CONTAINED/WON'T SPILL/GO ALL OVER	5
NOT TAKE UP MUCH SPACE/FITS EASILY IN CLOSET/DRAWER	5

PROJECT CLOSET CONSUMER PLACEMENT TEST
AFTER-USE RESULTS
Product Likes Following 4 Weeks of Use - Continued

FAVORABLE RESPONDENTS (N)	<u>USER</u> (114) %
<u>PRODUCT FEATURES (NET) CONT'D</u>	
CAN BE USED 2 WAYS/HANG IN CLOSET OR PLACE IN DRAWER	3
CAN BE USE IN CLOSETS	3
**HANGS OUT OF REACH OF CHILDREN/PETS	1
CAN PLACE IN BOXES/TRUNKS	1
<u>PRICE/ECONOMY (NET)</u>	
	<u>11</u>
GOOD/REASONABLE PRICE	5
GOOD PRICE FOR AMOUNT	3
<u>SAFETY (NET)</u>	
	<u>8</u>
SAFE TO USE AROUND CHILDREN/PETS	3
DON'T HAVE TO TOUCH INGREDIENTS/CHEMICALS	3
**HANGS OUT OF REACH OF CHILDREN/PETS	1
<u>BRAND EQUITY (NET)</u>	
	<u>6</u>
LIKE/BUY/USE OFF PRODUCTS	5
OFF GOOD/REPUTABLE BRAND	0

PROJECT CLOSET CONSUMER PLACEMENT TEST

AFTER-USE RESULTS

Product Likes Following 12 Weeks of Use

- Moth Control Users -

	<u>USERS</u>
FAVORABLE RESPONDENTS (N)	(77)
	%
<u>FAVORABLE COMMENTS (NET)</u>	<u>97</u>
<u>FRAGRANCE (NET)</u>	<u>78</u>
SMELLS BETTER THAN OTHER METHODS/NO MOTH BALL ODOR	24
PLEASANT FRAGRANCE	19
NO UNPLEASANT ODOR	17
LIKE FRAGRANCE (UNSPECIFIED)	7
LIGHT/MILD FRAGRANCE/NOT STRONG/HEAVY	6
FRESH/CLEAN FRAGRANCE	5
NO ODOR/NOT LEAVE AN ODOR	5
FRAGRANCE NOT CAUSE ALLERGIC REACTION	3
MAKES CLOTHES SMELL CLEAN/FRESH	3
NOT PERFUMEY	3
<u>EFFECTIVENESS (NET)</u>	<u>66</u>
<u>REPELS MOTHS (SUB-NET)</u>	<u>52</u>
REPELS/CONTROLS MOTHS	38
PROTECTS AGAINST MOTHS/PROTECTS CLOTHES FROM DAMAGE	8
KILLS MOTHS	3
<u>GENERAL EFFECTIVENESS (SUB-NET)</u>	<u>17</u>
EFFECTIVE/WORKS (UNSPECIFIED)	10
WORKS BETTER THAN OTHER METHODS	7
<u>LONG LASTING (SUB-NET)</u>	<u>12</u>
*ECONOMICAL BECAUSE LONG LASTING	6
LONG LASTING	5
<u>EASE/CONVENIENCE (NET)</u>	<u>40</u>
EASY/QUICK TO USE/JUST HANG IN CLOSET/PUT IN DRAWER	25
EASY TO INSTALL/HANG/HAS ITS OWN HANGER	9
NOT MESSY	5
EASY TO ACTIVATE/JUST PULL AWAY FOIL/EASY TO REMOVE TAB	3

* Denotes double coded.

k/icare/r40309m3/5

PROJECT CLOSET CONSUMER PLACEMENT TEST

AFTER-USE RESULTS

Product Likes Following 12 Weeks of Use

- Moth Control Users -

(Cont'd)

FAVORABLE RESPONDENTS (N)	<u>USERS</u> (77) %
<u>PRODUCT ATTRIBUTES (NET)</u>	<u>29</u>
HANGS/HANGS IN CLOSET	7
LIKE SIZE/SMALL SIZE	5
SELF-CONTAINED/WON'T SPILL/GO ALL OVER	5
NOT TAKE UP MUCH SPACE/FITS EASILY IN CLOSET/DRAWER	5
*HANGS OUT OF REACH OF CHILDREN/PETS	4
NOT NOTICEABLE/OUT OF THE WAY	3
<u>PRICE/ECONOMY (NET)</u>	<u>24</u>
GOOD/REASONABLE PRICE	12
*ECONOMICAL BECAUSE LONG LASTING	6
LESS EXPENSIVE THAN OTHERS	5
<u>SAFETY (NET)</u>	<u>10</u>
*HANGS OUT OF REACH OF CHILDREN/PETS	4
NON-TOXIC	3
NOT STAIN CLOTHES	3
<u>BRAND EQUITY (NET)</u>	<u>8</u>
GOOD/REPUTABLE BRAND	5
<u>UNFAVORABLE COMMENTS (NET)</u>	<u>6</u>
<u>MISCELLANEOUS</u>	
NEW/DIFFERENT/LIKE TO TRY NEW PRODUCTS	5
NOTHING DISLIKED	0

* Denotes double coded.

k/icare/r40309m3/6

PROJECT CLOSET CONSUMER PLACEMENT TEST

AFTER-USE RESULTS

Comparison of Product Likes Among A Static Sample Following 4 & 12 Weeks of Usage

- Moth Control Users -

- Efficacy & Price/Value perceptions improved throughout the test, reflecting consumer satisfaction in these areas.
- Ease/Convenience perceptions, as well as Fragrance comments, declined somewhat as the test lengthened and the product neared its use-up level.

FAVORABLE RESPONDENTS (N)	AFTER USE		
	Before Use	4 Weeks	12 Weeks
	(77) %	(77) %	(77) %
FRAGRANCE	88	81	78
EFFECTIVENESS	46	52	66
EASE/CONVENIENCE	51	46	40
PRODUCT FEATURES	22	26	29
PRICE/ECONOMY	21	13	24
BRAND EQUITY	12	4	8
SAFETY	11	10	10

PROJECT CLOSET CONSUMER PLACEMENT TEST

**AFTER-USE RESULTS
DISLIKES FOLLOWING 4 WEEKS OF USE**

	<u>USER</u> <u>(28)*</u> <u>%</u>
UNFAVORABLE RESPONDENTS (N)	
<u>FRAGRANCE (NET)</u>	<u>37</u>
NOT HAVE PLEASANT FRAGRANCE	10
DISLIKE FRAGRANCE (UNSPECIFIED)	9
NOT SMELL AS GOOD AS OTHER METHODS	7
FRAGRANCE NOT LIGHT/TOO HEAVY/TOO STRONG	6
**FRAGRANCE MADE EYES ITCHY AND UNCOMFORTABLE	4
<u>CATEGORY REJECTION (NET)</u>	<u>37</u>
NOT HAVE PROBLEM WITH MOTHS	37
<u>EFFECTIVENESS (NET)</u>	<u>19</u>
<u>REPELS MOTHS (SUB-NET)</u>	<u>16</u>
NOT REPEL/CONTROL MOTHS	8
NOT REPEL/CONTROL MOTHS AS WELL AS OTHER METHODS	3
<u>LONG LASTING (SUB-NET)</u>	<u>4</u>
NOT LAST LONG ENOUGH	4
<u>PRODUCT FEATURES (NET)</u>	<u>11</u>
UNATTRACTIVE PACKAGE	4
<u>SAFETY (NET)</u>	<u>8</u>
**FRAGRANCE MADE EYES ITCHY AND UNCOMFORTABLE	4
CONTAINS CHEMICALS/HARSH CHEMICALS	4
<u>PRICE/ECONOMY (NET)</u>	<u>4</u>
TOO EXPENSIVE	4
<u>MISCELLANEOUS</u>	
SATISFIED WITH PRESENT METHOD/PRODUCT	8
DISLIKE/NOT BUY/USE/NEED THIS TYPE PRODUCT	7

* Caution: Small Base Size.

** Denotes double coded.

k/ficare/r40309m3/8

PROJECT CLOSET CONSUMER PLACEMENT TEST

**AFTER-USE RESULTS
DISLIKES FOLLOWING 12 WEEKS OF USE**

	<u>USERS</u>
UNFAVORABLE RESPONDENTS (N)	(17)* %
<u>UNFAVORABLE COMMENTS (NET)</u>	<u>65</u>
<u>EFFECTIVENESS (NET)</u>	<u>40</u>
<u>GENERAL EFFECTIVENESS (SUB-NET)</u>	<u>14</u>
NOT EFFECTIVE/WORK (UNSPECIFIED)	14
<u>REPELS MOTHS (SUB-NET)</u>	<u>28</u>
NOT REPEL/CONTROL MOTHS	14
NOT PROTECT AGAINST MOTHS/NOT PROTECT CLOTHES FROM DAMAGE	7
<u>LONG LASTING (SUB-NET)</u>	<u>19</u>
NOT LAST LONG ENOUGH	13
NOT PROTECT CLOTHES LONGER THAN OTHER METHODS	6
<u>FRAGRANCE (NET)</u>	<u>19</u>
NOT HAVE PLEASANT FRAGRANCE	12
DISLIKE FRAGRANCE (UNSPECIFIED)	7
<u>FAVORABLE COMMENTS (NET)</u>	<u>6</u>
<u>FRAGRANCE (NET)</u>	<u>6</u>
PLEASANT FRAGRANCE	6
SMELLS BETTER THAN OTHER METHODS/NO MOTH BALL ODOR	6
<u>EASE/CONVENIENCE (NET)</u>	<u>6</u>
OTHER EASE/CONVENIENCE COMMENTS	6
<u>PRODUCT ATTRIBUTES (NET)</u>	<u>6</u>
SELF-CONTAINED/WON'T SPILL/GO ALL OVER	6
<u>PRICE/ECONOMY (NET)</u>	<u>6</u>
<u>MISCELLANEOUS</u>	
NOT HAVE PROBLEM WITH MOTHS	36
SATISFIED WITH PRESENT METHOD/PRODUCT	17
NEW/DIFFERENT/NOT LIKE TO TRY NEW PRODUCTS	5
NOTHING DISLIKED	0

* Caution: Small Base Size.

** Denotes double coded.

k/icare/r40309m3/9

PROJECT CLOSET CONSUMER PLACEMENT TEST

AFTER-USE RESULTS

- Comparison of Dislikes Among A Static Sample Across 4 & 12 Weeks-

- Moth Control Users -

- Although the small base is extremely small after 12 weeks, there were a few respondents who indicated they disliked the fragrance, efficacy, and price/value.
- Importantly, there were few, if any, Safety issues, and in fact following three months there were no mentions at all.

UNFAVORABLE RESPONDENTS (N)	<u>Before Use</u> (17)* %	<u>After Use</u>	
		<u>4 Weeks</u> (17)* %	<u>12 Weeks</u> (17)* %
FRAGRANCE	25	20	19
PRODUCT FEATURES	13	14	0
EFFECTIVENESS	6	21	40
SAFETY	6	7	0
CATEGORY REJECTION	6	0	0
PRICE/ECONOMY	0	0	6
EASE/CONVENIENCE	0	0	0

PROJECT CLOSET CONSUMER PLACEMENT TEST
PRODUCT ATTRIBUTE RATINGS BEFORE & AFTER USE

- Among Moth Control Users -

STATIC SAMPLE OF MOTH CONTROL USERS (N)	<u>Before Use</u> (288)	<u>AFTER USE</u>	
		<u>4 Weeks</u> (143)	<u>12 Weeks</u> (94)
IS EASY TO USE	6.5	6.8	6.8
HAS A PLEASANT FRAGRANCE	6.0	6.1	6.2
REPELS MOTHS	6.1	6.3	6.1
IS FOR ALL TYPES OF CLOTHING	5.8	6.5	6.5
IS SAFE FOR YOU TO USE	5.9	6.4	6.3
NO NEED TO DRY CLEAN OR AIR OUT CLOTHES AFTER USING THE PRODUCT	5.7	6.4	6.4
IS A BRAND I TRUST	5.9	6.3	6.4
ODOR DOESN'T LINGER	5.9	6.2	6.1
IS A GOOD VALUE FOR THE MONEY	5.6	5.7	5.7
IS NON-STAINING	5.5	6.5	6.6
IS MADE WITH NATURAL INGREDIENTS	5.4	5.9	5.9
IS EFFECTIVE FOR THE MOST SEVERE MOTH PROBLEMS	5.3	5.9	5.6
KILLS MOTHS	5.2	6.0	5.8
IS EFFECTIVE FOR A LONG TIME	5.1	5.7	5.7
KILLS MOTH EGGS AND LARVAE	4.4	5.9	5.6

PROJECT CLOSET CONSUMER PLACEMENT TEST

Comparison of Product Attribute Ratings Among A Static Sample Before & After Use

- Moth Control Users -

- The product delivered on the expectations established before use, as scores are very consistent among participants from concept all the way through the 3 month callback.
- The scores are also very high, as most are no lower than 6 on a 7 point scale.

(STATIC SAMPLE OF MOTH CONTROL USERS)	BEFORE - USE (94)	AFTER-USE	
		4 WEEKS (94)	12 WEEKS (94)
IS EASY TO USE	6.7	6.9	6.8
HAS A PLEASANT FRAGRANCE	6.4	6.4	6.2
REPELS MOTHS	6.4	6.4	6.1
IS FOR ALL TYPES OF CLOTHING	6.3	6.6	6.5
IS SAFE FOR YOU TO USE	6.2	6.8	6.3
NO NEED TO DRY CLEAN OR AIR OUT CLOTHES AFTER USING THE PRODUCT	6.2	6.5	6.4
IS A BRAND I TRUST	6.2	6.4	6.4
ODOR DOESN'T LINGER	6.2	6.3	6.1
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IS EFFECTIVE FOR THE MOST SEVERE MOTH PROBLEMS	5.7	6.0	5.8
KILLS MOTHS	5.6	6.1	5.8
IS EFFECTIVE FOR A LONG TIME	5.5	5.9	5.7
KILLS MOTH EGGS AND LARVAE	5.1	6.0	5.6

Note: A 7 point Scale was used, from Completely Describes (7) to Does Not Describe At All (1).

PROJECT CLOSET CONSUMER PLACEMENT TEST

AFTER-USE RESULTS

- Effectiveness Rating -

- Moth Control Users -

- At both 4 and 12 weeks, respondents thought the product worked very well, giving it a rating of 4.1 on a 5 point scale.

	<u>12-MONTH MOTH CONTROL USERS</u>	
	<u>4 WEEK USAGE</u>	<u>12 WEEK USAGE</u>
TOTAL RESPONDENTS (N)	<u>Total</u> (143) %	<u>Total</u> (94) %
+5.0 EXCELLENT	35	36
+4.0 VERY GOOD	41	50
+3.0 GOOD	16	8
+2.0 FAIR	3	1
+1.0 POOR	2	4
MEAN	4.1	4.1

PROJECT CLOSET CONSUMER PLACEMENT TEST

AFTER-USE RESULTS

- Pleasantness Of Fragrance -

- Moth Control Users -

- Respondents liked the fragrance, giving it very high top box and top two box ratings.
- Respondents' fragrance ratings did not change during the course of the test, as scores are virtually identical after both 4 and 12 weeks.

	<u>12-MONTH MOTH CONTROL USERS</u>	
	<u>4 WEEK USAGE</u>	<u>12 WEEK USAGE</u>
TOTAL RESPONDENTS (N)	Total (143) %	Total (94) %
+5.0 VERY PLEASANT	46	42
+4.0 SOMEWHAT PLEASANT	35	35
+3.0 NEITHER PLEASANT NOR UNPLEASANT	7	15
+2.0 SOMEWHAT UNPLEASANT	9	5
+1.0 VERY UNPLEASANT	2	2
MEAN	4.2	4.1

PROJECT CLOSET CONSUMER PLACEMENT TEST

- Effect On Moth Problem -

- Moth Control Users -

- After four weeks of use, over 60% felt the product had Totally Eliminated or Significantly Reduced their moth problem. Following 12 weeks, this had grown to over 70%.

	<u>12-MONTH MOTH CONTROL USERS</u>	
	<u>4 WEEK USAGE</u>	<u>12 WEEK USAGE</u>
	<u>Total</u> (143) %	<u>Total</u> (94) %
TOTAL RESPONDENTS (N)		
+4.0 TOTALLY ELIMINATED OR CONTROLLED YOUR MOTH PROBLEMS	30	51
+3.0 SIGNIFICANTLY REDUCED YOUR MOTH PROBLEM	31	20
+2.0 SOMEWHAT REDUCED YOUR MOTH PROBLEM	12	5
+1.0 HAD NO NOTICEABLE EFFECT ON YOUR MOTH PROBLEM	19	20
MEAN	2.8	3.1

10/5/95



Product Safety, Toxicology and
Environmental Assessment

FAX NOTE

DATE: November 8, 1995 **Pages:** 1

TO: Freshteh Toghrol, Ph. D., EPA-BPPD
(703) 308-7026

FROM: Leslie Lake, Project Manager, Strategic Actions
Phone: (414) 631-2955
Fax: (414) 631-3752

RE: Offl Mothproofer #5, 4822-UUN Field Test Report

Freshteh:

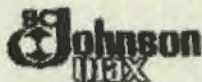
I spoke with the SC Johnson representative who is summarizing the findings from the Mothproofer field testing. He is currently preparing this report and will have it to me by Thursday of this week. I will fax the report directly to you as soon as I can on Thursday.

If you need anything in the interim or have any further questions, please call me at the phone number above.

Thanks again for the phone call on Friday.

Talk to you soon.

Leslie



Product Safety, Toxicology and
Environmental Assessment

FACSIMILE TRANSMISSION SHEET

TO: COMPANY John Tice, EPA-BPPD
ATTENTION ↑
FACSIMILE PHONE NO.: (703) 308-7026
NUMBER OF PAGES: 6 (Includes Transmission Sheet)

FROM: Leslie Lake DATE: Oct. 25, 1995
FAX: (414) 631-3752

COMMENTS:

John: Following is a discussion of the [REDACTED]
fragrance in Off! Mothproofer #5 and
points pertinent to our previous
phone discussion.

Glad that your fax machine had an
appendectomy and not a lobotomy!

Best Regards,
Please call if ?s. Thx. *Leslie*

The information contained in this communication is confidential, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying is strictly prohibited. If you have received this communication in error, please immediately notify us, collect, at the contact number below, so that we can arrange for retrieval of the original document at our cost. Thank you.

If there are problems with this transmission, please call Debbie Vance
at (414) 631-4703.

August 1

FIFRA

CONFIDENTIAL BUSINESS INFORMATION DOES NOT CONTAIN NATIONAL SECURITY INFORMATION (EO 12356)

SOME INFORMATION IN THE ATTACHED MATERIAL MAY BE ENTITLED TO TREATMENT AS TRADE SECRET OR PROPRIETARY DATA UNDER SECTION 7(d) AND SECTION 10 OF THE FEDERAL INSECTICIDE, FUNGICIDE AND RODENTICIDE ACT (FIFRA) AS AMENDED.

ANY PERSON HANDLING OR USING THE ATTACHED DATA IN ANY WAY IS RESPONSIBLE FOR PREVENTING UNAUTHORIZED DISCLOSURE WHILE IN HIS POSSESSION. SECTION 12(a)(2)(D) MAKES IT UNLAWFUL FOR ANY EMPLOYEE TO USE TO HIS OWN ADVANTAGE OR TO REVEAL ANY CONFIDENTIAL INFORMATION (EXCEPT TO PERSONS NEEDING THE INFORMATION FOR THE PERFORMANCE OF OFFICIAL DUTIES). A PENALTY OF UP TO \$10,000 FINE AND UP TO 3 YEARS IMPRISONMENT MAY RESULT FROM CONVICTION OF A VIOLATION OF SECTION 12(a)(2)(D).

SECTION 10(f) MAKES IT A CRIME FOR ANY EMPLOYEE TO DISCLOSE CONFIDENTIAL INFORMATION EXCEPT AS AUTHORIZED BY SECTION 7 AND 10 OF FIFRA. A PENALTY OF UP TO \$10,000 FINE AND UP TO ONE YEAR IN JAIL MAY RESULT FROM CONVICTION OF A VIOLATION OF SECTION 10(f).

THE ATTACHED INFORMATION IS NOT TO BE PUBLISHED, REPRODUCED, PUBLICLY DISCUSSED, INCLUDED IN RESPONSE TO AN FOI REQUEST OR OTHERWISE RELEASED WITHOUT THE EXPLICIT WRITTEN AUTHORIZATION OF THE APPROPRIATE DIVISION DIRECTOR OR HIS DESIGNEE.

5 T



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236
Phone: (414) 631-2000

VIA FEDERAL EXPRESS

October 17, 1995

Mr. Phil Hutton
Team Leader
U.S. Environmental Protection Agency
Office of Biopesticides and Pollution
Prevention Division
Office of Pesticide Programs
2800 Jefferson Davis Highway
Arlington, VA 22202

Dear Mr. Hutton:

Re: Cancellation of Four Pending Registrations at EPA

In our meeting on August 31, we talked about cancelling some of our pending moth proofer registrations now that our Off! Moth Proofer 5 product has demonstrated performance in the field and is on track for registration at EPA. We have added an additional product to our list of cancelled pending registrations.

The pending registrations we would like to cancel are:

4822-UUR	Off! Moth Proofer 6 (Lavender)
4822-UER	Off! Moth Proofer 4 (Lemongrass)
4822-URO	Off! Moth Proofer 2 (Cedarleaf)
4822-UEN	Off! Moth Proofer 3 (Lemongrass)

I have enclosed a copy of our new Revised Priority Ranking for our Pending Actions at BPPD. The priority ranking reflects the cancellation of the above pending registrations.

If you have any questions please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist
Enclosure

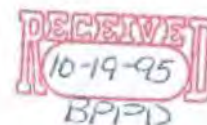
cc: Bob Torla



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236
Phone: (414) 631-2000

VIA FEDERAL EXPRESS

*Bob
John T.*



October 17, 1995

Ms. Janet Andersen
Acting Division Director of Biopesticides
and Pollution Prevention Division
U.S. Environmental Protection Agency
Office of Pesticide Programs
2800 Jefferson Davis Highway
Arlington, VA 22202

Dear Ms. Andersen:

Re: Revised Priority Ranking for our Pending Actions at EPA

As follow-up to our meeting with you on August 31, I've enclosed a list of S. C. Johnson pending actions at EPA - BPPD. This list reflects the cancellation of 4 Moth Proofer pending registrations. Below is a status report for each pending action, listed in order of priority.

1. 4822-UUN Off! Moth Proofer 5 (Lavender)

Status: Working closely with EPA on this one to obtain registration

2. 4822-URI Off! Moth Proofer 1 (Cedarleaf)

Status: We will be submitting additional data following the registration of Off! Moth Proofer 5

3. 4822-400 Raid Max Roach Sterilizer Discs

Status: Waiting for approval of our CR claim that was submitted on 1/14/94

If you have any questions regarding the above priorities, please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist
Enclosures

cc: Phil Hutton
John Tice

Priority Ranking of Pending Actions at EPA

#1	4822-UUN	Off! Moth Proofer 5 (Lavender)
#2	4822-URI	Off! Moth Proofer 1 (Cedarleaf) (SCJ will submit additional data)
#3	4822-400	Raid Max Roach Sterilizer Discs

Cancelled Pending Registrations

4822-UUR	Off! Moth Proofer 6 (Lavender)
4822-UER	Off! Moth Proofer 4 (Lemongrass)
4822-URO	Off! Moth Proofer 2 (Cedarleaf)
4822-UEN	Off! Moth Proofer 3 (Lemongrass)

Der 7
eye 50% \rightarrow $\left[\begin{smallmatrix} 0.1 \\ 0.2 \end{smallmatrix} \right]$ phr

2 ~~Pesticide~~ \leftarrow ~~Franchises~~ \rightarrow

Atom in halat \rightarrow

142/Kg¹
38

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Nat Food

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53

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2-5.

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

OCT 10 1995

S.C. JOHNSON & SON, INC
1525 HOWE ST
RACINE, WI 534035011

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 10/05/95. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

*Dean sheet for
Fresher.*



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

438068- $\phi\phi$

VIA FEDERAL EXPRESS

October 4, 1995

Mr. Bob Torla
Team Leader
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

ATTN: John Tice

Dear Mr. Torla:

Re: Off! Moth Proofer 5
EPA Reg. File Symbol 4822-UUN

Per our follow-up actions on Off! Moth Proofer 5, EPA Reg. File Symbol 4822-UUN, we are providing air sampling data and viscosity data for your review. We are still working on getting the 30 day top lines from field testing to you.

Enclosed please find:

3 copies of Aspiration Hazard Evaluation 43806801
3 copies of Inhalation Exposure Characteristics 43806802

If you have any questions concerning this submission please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist
Enclosures

*Aspiration Hazard
Inhalation Exp. Characteristics*



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

438068- $\phi\phi$

VIA FEDERAL EXPRESS

October 4, 1995

Mr. Bob Torla
Team Leader
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

ATTN: John Tice

Dear Mr. Torla:

Re: Off! Moth Proofer 5
EPA Reg. File Symbol 4822-UUN

Per our follow-up actions on Off! Moth Proofer 5, EPA Reg. File Symbol 4822-UUN, we are providing air sampling data and viscosity data for your review. We are still working on getting the 30 day top lines from field testing to you.

Enclosed please find:

3 copies of Aspiration Hazard Evaluation
3 copies of Inhalation Exposure Characteristics

43806801

43806802

If you have any questions concerning this submission please call me at 414-631-3553. 29-5

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist
Enclosures



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

RECEIVED
10/4/95
BYED

VIA FEDERAL EXPRESS

September 25, 1995

Mr. Bob Torla
Team Leader
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attn: John Tice

Dear Mr. Torla:

RE: Off! Moth Proofer 5, EPA Reg. File Symbol 4822-UUN

Per our phone conversation, I am enclosing a revised confidential statement of formula to reflect the active ingredient as Lavandin Oil.

If you have any questions please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist
Enclosure



09/22/95

Reference Files System

Page: 1

Chemistry Data Report

Active Ingredient Code: 128874

Full Chemical Name:

[REDACTED]

Lavandin oil

- 11.4944 %

[REDACTED]

Reregistration Case No.:
Case Name:

FIFRA 88 List:

Toxicology Caswell Nr.:

CAS Number:

Product Manager: 90 BPPD

Review Manager:

OCM Compliance Manager:

Chemical Name Type: Report Chemical Name

Type Synonymous Name

T Off! Moth proofer 5

Lavandin oil

597600

FEDERAL REGISTER DRAFT INFORMATION SHEET FOR PUBLICATION OF:
(Check applicable item)

- ☒ 1. Application, Register Pest. Product With New Ingredient
- ☐ 2. Application, Registered Pest. Product Entailing a Changed Use Pattern
- ☐ 3. Approval, Application to Register Pest. Product with New A.I.
- ☐ 4. Approval, Application to Register Pest. Product Entailing a Changed Use Pattern

PLEASE PROVIDE THE FOLLOWING INFORMATION

A. Complete Company Name and Address

S.C. Johnson & Son, Inc.

1525 Howe Street

Racine, Wisconsin 53403

B. Product Name: OFF! Moth Proofer 5

C. Type of product (Insecticide/Rodenticide, etc.) Other
Insect Repellant

D. File Symbol/ Registration Number 4822-UUN

E. Chemical Name: Levandin Oil

F. % Active Ingredient: 11.49%

G. Proposed/Approved Classification: General Use

H. Use Pattern: (specify the change)
Moth Repellant

I. Type of Registration/Approval: Full ☒ Conditional ☐

J. Other information you think appropriate for publication purposes:

NOTE: The Divisions' name and director is:

Janet L. Andersen, Acting Director

Biopesticides and Pollution Prevention Division (7501-W)



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

VIA FEDERAL EXPRESS

September 12, 1995

Ms. Janet Andersen
Acting Division Director of Biopesticides
and Pollution Prevention Division
U.S. Environmental Protection Agency
Office of Pesticide Programs
2800 Jefferson Davis Highway
Arlington, VA 22202

Dear Ms. Andersen:

Re: Revised Priority Ranking for our Pending Actions at EPA

As follow-up to our meeting with you on August 31, I've enclosed a list of S. C. Johnson pending actions at EPA - BPPD. This list reflects the cancellation of 3 Moth Proofer pending registrations. Below is a status report for each pending action, listed in order of priority.

1. 4822-422 Off! Citronella Candle

Status: Still waiting for approval of alternate CSF's and label that were submitted:

3/9/95	alternate fragrance submitted (vanilla)
3/28/95	revised label incorporating additional directions for use and fragrance violator claims
5/16/95	alternate CSF's incorporating revised certified limits on [REDACTED] for manufacturing purposes

2. 4822-UUN Off! Moth Proofer 5 (Lavender)

Status: Working closely with EPA on this one to obtain registration

3. 4822-UEN Off! Moth Proofer 3 (Lemongrass)

4. 4822-URI Off! Moth Proofer 1 (Cedarleaf)

Status: We will be submitting additional data following the registration of Off! Moth Proofer 5

Inert ingredient information may be entitled to confidential treatment

5. 4822-400 Raid Max Roach Sterilizer Discs

Status: Waiting for approval of our CR claim that was submitted on 1/14/94

If you have any questions regarding the above priorities, please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist
Enclosures

cc: Phil Hutton

John Tice

Leslie Lake

Priority Ranking of Pending Actions at EPA

#1	4822-422	Off! Citronella Candle
#2	4822-UUN	Off! Moth Proofer 5 (Lavender)
#3	4822-UEN	Off! Moth Proofer 3 (Lemongrass) (SCJ will submit additional data)
#4	4822-URI	Off! Moth Proofer 1 (Cedarleaf) (SCJ will submit additional data)
#5	4822-400	Raid Max Roach Sterilizer Discs

Cancelled Pending Registrations

4822-UUR	Off! Moth Proofer 6 (Lavender)
4822-UER	Off! Moth Proofer 4 (Lemongrass)
4822-URO	Off! Moth Proofer 2 (Cedarleaf)



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

VIA FEDERAL EXPRESS

September 6, 1995

Mr. John Tice
Regulatory Action Leader
Biopesticides and Pollution Prevention Division (7503W)
U.S. Environmental Protection Agency
Office of Pesticide Programs
2800 Jefferson Davis Highway
Arlington, VA 22202

Dear Mr. Tice:

RE: Off! Moth Proofer 5, EPA Reg. No. 4822-UUN

Thank you for meeting with us regarding the above product registration. We found this meeting insightful and now have a better understanding of the action steps required for approval of a new active ingredient such as Lavandin Oil. Likewise, we hope that our discussions helped to give you a historical perspective on the Lavendar Moth Proofer and the reviews that were conducted previously by Roy Sjoblad and Dwight Welch in support of an Experimental Use Permit granted for this product.

This note is to summarize SCJ's next steps for registration of Off! Moth Proofer 5 as well as the actions that EPA outlined for processing our registration. Actions steps are as follows:

SCJ Action Steps

- Provide EPA with 30 day top-lines from field testing and copy of survey
- Air sampling data
- Viscosity data

EPA Action Steps

- Post Lavandin Oil in the Federal Register (with other proposed a.i.s)
- Determine chemistry requirements for essential oils (Dwight Welch may be able to provide insight here.)
- Conduct a risk-benefit assessment for Lavandin Oil

This letter represents our impression of the discussions we had on August 23. Please let us know if this is agreeable to you and your team.

If you have any questions please give me a call at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist

cc: Bob Torla
Roy Sjoblad
Leslie Lake



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

VIA FEDERAL EXPRESS

September 6, 1995

Mr. John Tice
Regulatory Action Leader
Biopesticides and Pollution Prevention Division (7503W)
U.S. Environmental Protection Agency
Office of Pesticide Programs
2800 Jefferson Davis Highway
Arlington, VA 22202

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Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist

cc: Bob Torla
Roy Sjoblad
Leslie Lake

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

AUG 29 1995

S.C. JOHNSON & SON, INC
1525 HOWE ST
RACINE, WI 534035011

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 08/24/95. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your data submittal was found to be partially in compliance with the standards for submission of data contained in PR Notice 86-5, with the exceptions noted below. A copy of your transmittal bibliography is enclosed, annotated with the Master Record ID's (MRIDs) assigned to each document accepted. Please use these numbers in all future references to these documents. If deficiencies were found which apply to individual accepted studies, they are listed below following the applicable MRID. Any document which has been assigned a MRID has been accepted under PR Notice 86-5. If any comments related to a MRID appear on this report, they are provided for your information and reference when preparing future submissions. Some individual documents were not acceptable, and all copies are being returned to you for correction for the reasons indicated below. These rejected studies have been assigned separate identification numbers which are annotated on both the enclosed bibliography and the rejected document labels. The rejected studies and their deficiencies are described below.

Rejected study [01] :

A statement of compliance or non-compliance with the Good Laboratory Practices Standards contained in 40 CFR160 is required for all studies (except range finding studies and supplements to previously submitted studies) submitted to EPA. This statement must appear as page 3 of all studies, and must be signed and dated by the study sponsor, the study submitter, and the study director. Please see 40 CFR 160.12 for specific guidance.



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

VIA FEDERAL EXPRESS

July 20, 1995

Ms. Janet Andersen
Acting Division Director of Biopesticides
and Pollution Prevention Division (7503W)
U.S. Environmental Protection Agency
Office of Pesticide Programs
2800 Jefferson Davis Highway
Arlington, VA 22202

437653-*PP*

Dear Ms. Andersen:

Re: OFF! Moth Proofer 5
EPA Reg. No. 4822-UUN

We are now submitting the necessary studies to complete our registration package for the above-mentioned registration. These studies were done non-glp based on discussions we had with Dwight Welch and the Off! Moth Proofer review team.

Also enclosed is a summary of each of the relevant toxicity categories for your information. This summary should also be given to the toxicologist reviewing the studies we are submitting.

Enclosed please find:

Toxicity Category Summary	
Confidential Statement of Formula	
5 copies of draft labeling	
3 copies of Primary eye irritation study	43765301
3 copies of Primary dermal irritation study	43765302
3 copies of acute oral toxicity evaluation	Reg (P1)
3 copies of fragrance ingredient toxicity and irritation evaluation	

Admin.

If you have any questions regarding this submission please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist
Enclosures

S. C. Johnson & Son, Inc.

Racine, Wisconsin U.S.A. 53403-2236

Worldwide Consumer Products
Research, Development & Engineering

FACSIMILE TRANSMISSION SHEET

TO: ATTENTION: John Tice
COMPANY: U.S. EPA
FACSIMILE PHONE NO: 703-308-7026

NUMBER OF PAGES: 1
(includes Transmission Sheet)

The information contained in this communication is confidential, and intended only for the use of the addressee. Unauthorized use, disclosure or copying is strictly prohibited. If you have received this communication in error, please immediately notify us, collect, at the contact number below, so that we can arrange for retrieval of the original document at our cost. Thank you.

FROM: Devi Vander Heest
Regulatory Affairs & Registration Group

DATE: 8/28/95

MESSAGE:

Thanks for meeting with Healie and I
on Wednesday of last week. Thought our
meeting was very productive. Could you
pass over to me your guidelines on unit
labeling that we talked about. Also need
to know status of 4822-422, alternate CSF's
and updated labeling. Just call if you
have any questions on Mouch Proofer 5

Devi

If there are problems with this transmission, please telephone (414) 631-2622
OR Fax us at (414) 631-4716. Thank you.

8/22/95 MTG.

S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, Wisconsin 53403-2236
Phone: (414) 631-2955 • Fax: (414) 631-3752



Leslie K. Lake
Senior Research Toxicologist
Scientific Support & Government Compliance



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, Wisconsin 53403-5011
Phone: (414) 631-3553 • FAX: (414) 631-4716



Geri L. Vander Leest
Registration Specialist



3 Achievements

hemangas
Cedar leaf

lavender - products

Eup - conducted field test
for the results preferred

MTG. Aug 23, 95

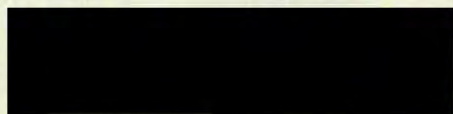
@ 2:30 - 4:00
CS 1 5th floor.

SOJ * Submit how adverse health effects were done / collected - that report should be submitted.

we will review the 30 day report.

Eup - additional data.

lavender oil.



Data:

SOJ * aspiration labeling - has data re: viscosity

SOJ * will submit data on air sampling / disinfection

dermal irritation - bridge with data

EPA Meeting Agenda - August 23, 1995

Participants: Phil Hutton ✓ *Bob Torlu*
John Tice ✓
Roy Sjoblad
✓ Leslie Lake, Senior Research Toxicologist
✓ Geri Vander Leest, Registration Specialist

1. Off! Moth Proofer 5, EPA Reg.Symbol 4822-UUN**Background**

Registration package submitted to EPA on July 20 (contained necessary studies to complete registration package)

Exposure data

Tox data

Non-glp studies

Memo of Understanding (MOU) between EPA and CA (data issues)

Precautionary Labeling

Not an aspiration hazard

Amended precautionary statement

Principle package and carton labeling

Any Other Related Issues

2. Moth Proofer #5 Active component - Lavandin oil

Approval as active ingredient

FDA - approved for food use

GRAS

Approved inerts list

Designation as reduced risk pesticide

Safer alternative to mothballs (p-DCB) and naphthalene

California concurrent review

Review by other states

3. Lemongrass/Cedarleaf Registrations

Status of Lemongrass (4822-UEN)

Toxicology findings

Status of Cedarleaf (4822-URI)

4. Closing Comments

EPA Meeting Agenda - August 23, 1995

Participants: Phil Hutton
John Tice
Roy Sjoblad
Leslie Lake, Senior Research Toxicologist
Geri Vander Leest, Registration Specialist

* 1. Off! Moth Proofer 5, EPA Reg.Symbol 4822-UUN

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Toxicology findings

Status of Cedarleaf (4822-URI)

4. Closing Comments

Consumer Feedback on Moth Control Products

Attitude & Usage Survey

Mothballs: significant shortfalls identified by consumers

- * not safe for the environment
- * need to dry clean or air out clothes after using the product
- * don't have a pleasant fragrance
- * odor lingers
- * have a heavy smell

The key shortfall for mothballs is their lingering, unpleasant odor.

Cedar blocks:

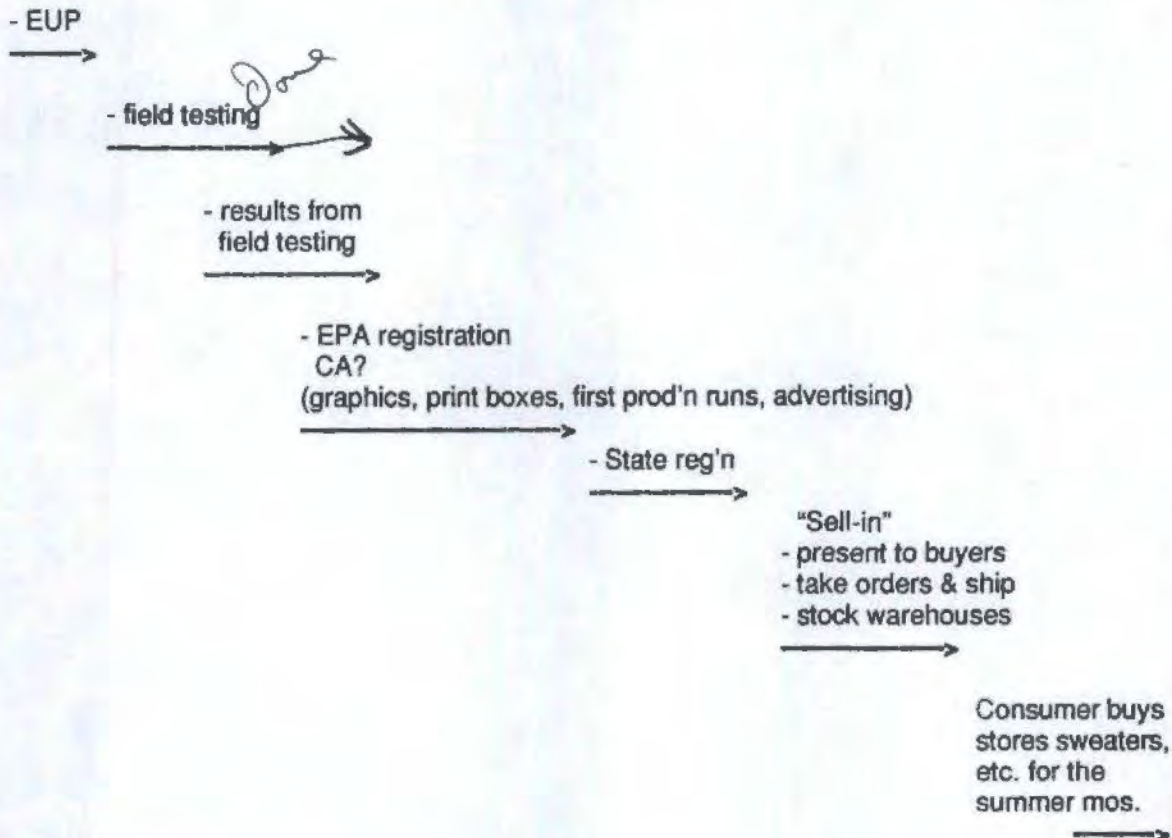
- * not effective for most severe moth problems
- * don't kill moth and larvae

The key shortfall for cedar blocks is lack of strong effectiveness, including killing eggs and larvae.

Opportunity: develop an efficacious moth control product that is both pleasant smelling and "safer" than the products currently available in the marketplace.

Next Steps for Introducing Off! Moth Proofer 5 to the Marketplace

1995
1996
 May/ June/ July/ Aug./ Sept./ Oct./ Nov./ Dec./ Jan./ Feb./ Mar./ Ap/Ma



Field Test Results

Top-line: 80% of moth control product users say they would definitely buy Moth Proofer #5 (74% is the internal benchmark), primarily based on efficacy and pleasant fragrance.

Launch considerations

Because of the seasonality associated with clothes storage, we need to introduce the product to consumers in April/May, depending on the region.

Goal: Introduce Off! Moth Proofer #5 to the trade in December 1995 and to consumers in April/May 1996.

Toxicity Concerns: p-Dichlorobenzene (p-DCB) and Naphthalene

Naphthalene:

Naphthalene is a human poison by ingestion; poisoning may also occur by the inhalation or dermal routes of exposure.

- fatal human dose from oral exposure is approx. 2 grams (USEPA Drinking Water Health Advisory)
- infants may be exposed to residual naphthalene on clothing that has been stored with mothballs containing naphthalene -- of concern because:
 - * naphthalene is readily absorbed through the skin * ?
 - * diapers stored with mothballs have caused skin rashes and systemic poisoning
- signs and symptoms of exposure include: nausea, vomiting, headache, diaphoresis, hematuria, hemolytic anemia, fever, hepatic necrosis, convulsions, and coma
(Clinical Toxicology of Commercial Products, R. E. Gosselin et al. Eds., 4th Edition, pp. 242-246)

p-DCB:

USEPA classifies p-DCB as a possible human carcinogen; the State of California lists p-DCB as a chemical "known to the state to cause cancer" with a no significant risk exposure level of 20 micrograms per day.

Europe restricts the use of p-DCB because of aquatic toxicity and its comparatively slow rate of biodegradation.

**INHALATION EXPOSURE CHARACTERISTICS OF
MOTHPROOFER 5 (EPA 4822-UUN)
FORMULA NUMBER 14490P67**

DOCUMENT NUMBER: 14490P67_A1

STUDY NUMBER: 9407_ A1

Product Name: Mothproofer 5 (EPA 4822-UUN)

Active Ingredients: Lavandin Oil

Formula Number: 14490P67 *↔ Data are for*

Data Requirements: none

Author: Kenneth J. Welch

Study Initiation

Date: 27 June 1995

Study Completion

Date: 8 August 1995

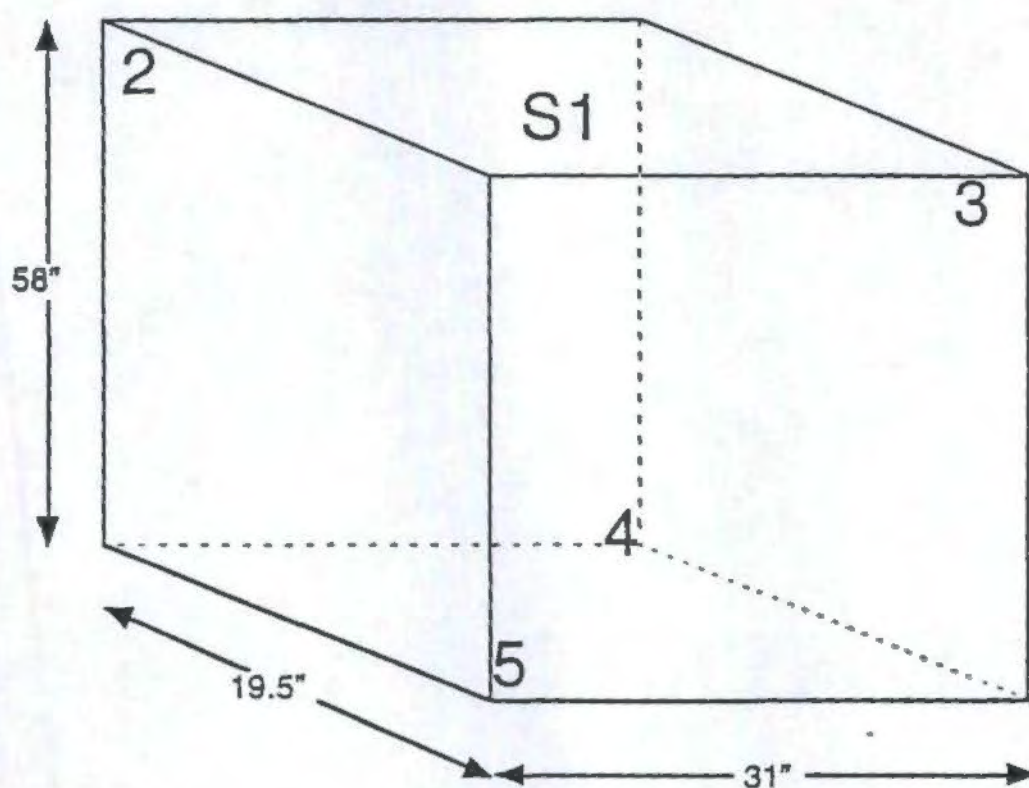
Sponsor Address: S. C. Johnson & Son, Inc., 1525 Howe St., Racine, WI 53403

Testing Facility Address: S. C. Johnson & Son, Inc.,
1525 Howe St., Racine, WI 53403

APPENDIX

Environmental Chamber and Placement of the Source and Air Sampling Devices.

20.25 cu.ft. Environmental Chamber



1-5: Sampling Locations
S: Source

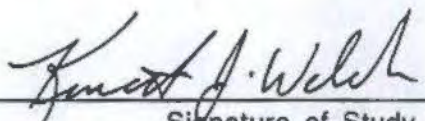
INHALATION EXPOSURE OF MOTHPROOFER 5 (EPA 4822-UUN)

Formula Number 14490P67
Document Number 14490P67_A1
Study Number 9407_A1

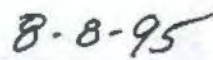
SUMMARY OF RESULTS

Atmospheric Lavandin Oil Concentration $\mu\text{g/L}$ (mg/m^3) at Specified Location

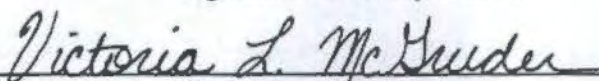
Mothproof Sample	Chamber Location				
	1	2	3	4	5
14490P67 3-gram fill Trial 1	1.54	0.895	0.915	0.819	0.837
14490P67 5-gram fill Trial 1	1.12	0.899	0.932	0.864	0.808
14490P67 3-gram fill Trial 2	2.41	1.35	1.54	1.28	1.28
14490P67 5-gram fill Trial 2	1.53	1.06	1.26	1.11	1.01
Distance from Source (inches)	3	12	17	51	53



Signature of Study Director



Date



Signature of Analyst



Date



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

RECEIVED
8/25/95
BDD

TICE

B.U.

VIA FEDERAL EXPRESS

August 22, 1995

AMENDMENT

Mr. Phil Hutton
Product Manager 90
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attn: John Tice

Dear Mr. Hutton

Re: OFF! Moth Proofer 5
EPA Reg. File Symbol 4822-UUN

Enclosed please find an application for Pesticide Amendment and 5 copies of the revised label.

This revised label reflects updated precautionary statements based on new test data that was submitted to EPA on July 20, 1995.

Based on our new test data results this product is not a skin irritant and the LD 50 of 70% of the formulation is > 5 g/kg.

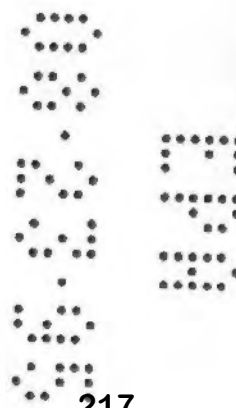
If you have any questions concerning this submission please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist

Enclosures





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

246859

Application for Pesticide - Section I

1. Company/Product Number 4822-UUN	2. EPA Product Manager Hutton	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) OFF! Moth Proofer 5	PM# 90	
5. Name and Address of Applicant (Include ZIP Code) S. C. Johnson & Son, Inc. 1525 Howe Street Racine, WI 53403 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Revised labeling to reflect updated precautionary statements based on new test data.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Geri L. Vander Leest		Title Registration Specialist		Telephone No. (Include Area Code) (414) 631-3553	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped) 218
2. Signature 		3. Title Registration Specialist			
4. Typed Name Geri L. Vander Leest		5. Date 08/22/95			

PAPERWORK REDUCTION ACT NOTICE and INSTRUCTIONS

PAPERWORK REDUCTION ACT NOTICE: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460.

INSTRUCTIONS: This form is to be used for all applications for new registration, and use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). [If not exempted by 40 CFR 152.81 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper for submission or a mockup of the proposed label. If prepared for mockup, it should be constructed in a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registration that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size(s) of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** - Indicate the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

- 1-5. Self-explanatory.
6. EPA Use Only.

FRONT PANEL

OFF! Moth Proofer 5

New

(Fresh) (Pleasant) Lavender Scent

Outdoor Fresh Scent

Spring Fresh Scent

Spring Breeze Scent

(Pleasant) (Fresh) Scent

(Country) Fresh Scent

Soft Sachet Scent

Floral Bouquet Scent

Sunshine (Fresh) Scent

(Pleasant) (Country) Spice Scent

(Fresh) Herbal Scent

(Effectively) controls moth problems with a pleasant scent

No unpleasant mothball smell

No harsh chemicals

No need to dry clean (or) (air out your) clothes (garments) after storage (use)

Protects clothes from moth damage

Keeps moths off clothes

Effective for one season

Lavender Formula

Protects clothes from (moth) damage for one (two) (three) (four) months (season long) (for one season)

Freshens closets (drawers) while protecting clothes from (moth) damage

Repels (kills) (controls) (moths) (moth eggs and larvae) (pupae) (which cause damage to clothes)

Easy to use

No mess

Convenient to use

Unique (clothes) (garment) protection (with a pleasant scent)

Not only protects (your) clothes, it freshens (your) closet (drawers)

Protects (your) clothes from moths (damage) with a (natural), fresh (pleasant) (lavender) scent

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Contains (number) (name) (hangers) (units) (fresheners)

Net Contents: contains 2 units

net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back

OFF! Moth Proofer 5

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT: IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

Questions? Comments? Call 800-558-5252 weekdays, 9-9 Eastern Time or Write Helen Johnson
© 1994 S. C. Johnson & Son, Inc. Racine, WI 53403-2236 U.S.A. All Rights Reserved.

EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

Unit Labeling

OFF! Moth Proofer 5

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Net Contents .11 oz. per unit

Keep Out Of Reach Of Children

CAUTION

See outer package for additional precautionary statements and complete directions

EPA Reg. No. 4822-

EPA Est. No. 4822-WI-1

S. C. Johnson & Son, Inc. Racine, WI 53403-2236 All rights reserved.

BACK PANEL

OFF! Moth Proofer 5

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. (Separate the two units.) Slowly remove foil label from the (fragrance) cartridge using peel tab. Do not remove or puncture white (clear) film protecting (colored) (fragrance) concentrate (gel). This film controls the release of concentrated (freshening) (protection) ingredients. (Insert cartridge into holder unit.)
2. This product can be placed inside drawers and storage boxes or hung in closets. Use one unit in smaller (average size) closets, drawers or boxes, two in larger closets, drawers or boxes (and close tightly). **Important:** For maximum effectiveness, closets, drawers or boxes must be kept as air tight as possible. Dry clean clothes (garments) (fabrics) before storing (Clean clothes (garments) (fabrics) before storing).
3. When the (fragrance) concentrate (gel) dries and cracks (turns to powder), this signals replacement time (for the cartridge). (Replace all (name) (units) every (one) (two) (three) (four) months (season)).

STORAGE: Store in a cool area away from children.

DISPOSAL: Wrap and put in trash collection.

FRONT PANEL

OFF! Moth Proofer 5

New

(Fresh) (Pleasant) Lavender Scent

Outdoor Fresh Scent

Spring Fresh Scent

Spring Breeze Scent

(Pleasant) (Fresh) Scent

(Country) Fresh Scent

Soft Sachet Scent

Floral Bouquet Scent

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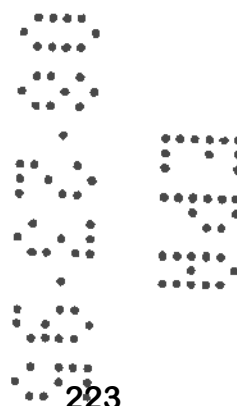
Net Contents: contains 2 units

net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back



OFF! Moth Proofer 5

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© 1994 S. C. Johnson & Son, Inc. Racine, WI 53403-2236 U.S.A. All Rights Reserved.

EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

Unit Labeling

OFF! Moth Proofer 5

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Net Contents .11 oz. per unit

Keep Out Of Reach Of Children

CAUTION

See outer package for additional precautionary statements and complete directions

EPA Reg. No. 4822-

EPA Est. No. 4822-WI-1

S. C. Johnson & Son, Inc. Racine, WI 53403-2236 All rights reserved.

BACK PANEL

OFF! Moth Proofer 5

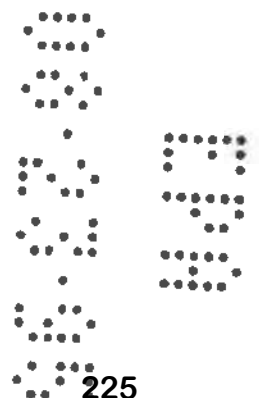
DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. (Separate the two units.) Slowly remove foil label from the (fragrance) cartridge using peel tab. Do not remove or puncture white (clear) film protecting (colored) (fragrance) concentrate (gel). This film controls the release of concentrated (freshening) (protection) ingredients. (Insert cartridge into holder unit.)
2. This product can be placed inside drawers and storage boxes or hung in closets. Use one unit in smaller (average size) closets, drawers or boxes, two in larger closets, drawers or boxes (and close tightly). **Important:** For maximum effectiveness, closets, drawers or boxes must be kept as air tight as possible. Dry clean clothes (garments) (fabrics) before storing (Clean clothes (garments) (fabrics) before storing).
3. When the (fragrance) concentrate (gel) dries and cracks (turns to powder), this signals replacement time (for the cartridge). (Replace all (name) (units) every (one) (two) (three) (four) months (season)).

STORAGE: Store in a cool area away from children.

DISPOSAL: Wrap and put in trash collection.



FRONT PANEL

OFF! Moth Proofer 5

New

(Fresh) (Pleasant) Lavender Scent

Outdoor Fresh Scent

Spring Fresh Scent

Spring Breeze Scent

(Pleasant) (Fresh) Scent

(Country) Fresh Scent

Soft Sachet Scent

Floral Bouquet Scent

Sunshine (Fresh) Scent

(Pleasant) (Country) Spice Scent

(Fresh) Herbal Scent

(Effectively) controls moth problems with a pleasant scent

No unpleasant mothball smell

No harsh chemicals

No need to dry clean (or) (air out your) clothes (garments) after storage (use)

Protects clothes from moth damage

Keeps moths off clothes

Effective for one season

Lavender Formula

Protects clothes from (moth) damage for one (two) (three) (four) months (season long) (for one season)

Freshens closets (drawers) while protecting clothes from (moth) damage

Repels (kills) (controls) (moths) (moth eggs and larvae) (pupae) (which cause damage to clothes)

Easy to use

No mess

Convenient to use

Unique (clothes) (garment) protection (with a pleasant scent)

Not only protects (your) clothes, it freshens (your) closet (drawers)

Protects (your) clothes from moths (damage) with a (natural), fresh (pleasant) (lavender) scent

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Contains (number) (name) (hangers) (units) (fresheners)

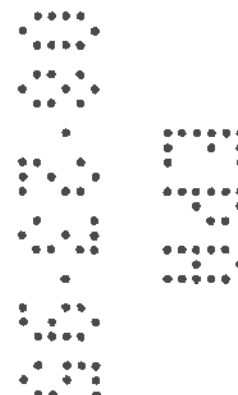
Net Contents: contains 2 units

net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back



OFF! Moth Proofer 5

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT: IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

Questions? Comments? Call 800-558-5252 weekdays, 9-9 Eastern Time or Write Helen Johnson
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EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

Unit Labeling

OFF! Moth Proofer 5

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Net Contents .11 oz. per unit

Keep Out Of Reach Of Children

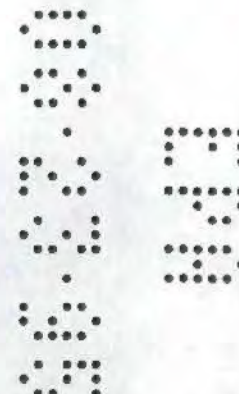
CAUTION

See outer package for additional precautionary statements and complete directions

EPA Reg. No. 4822-

EPA Est. No. 4822-WI-1

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BACK PANEL

OFF! Moth Proofer 5

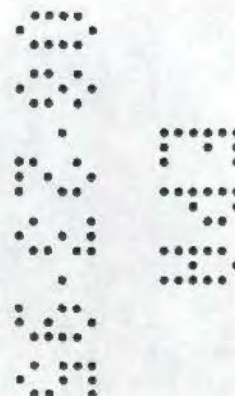
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STORAGE: Store in a cool area away from children.

DISPOSAL: Wrap and put in trash collection.



FRONT.PANEL

OFF! Moth Proofer 5

New

(Fresh) (Pleasant) Lavender Scent

Outdoor Fresh Scent

Spring Fresh Scent

Spring Breeze Scent

(Pleasant) (Fresh) Scent

(Country) Fresh Scent

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Sunshine (Fresh) Scent

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Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Contains (number) (name) (hangers) (units) (fresheners)

Net Contents: contains 2 units

net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back

OFF! Moth Proofer 5

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

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EPA Reg. No. 4822-
EPA Est. No. 4822-WI-1

Unit Labeling

OFF! Moth Proofer 5

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Net Contents .11 oz. per unit

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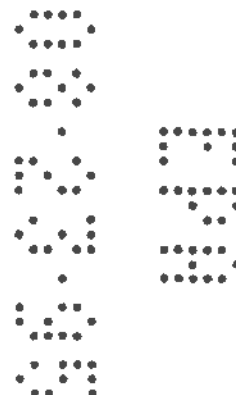
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EPA Est. No. 4822-WI-1

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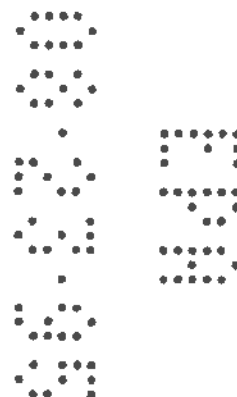
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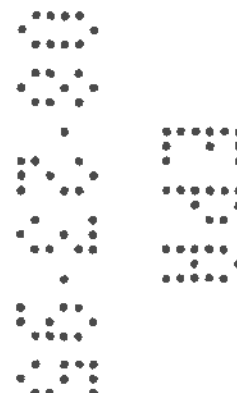
Net Contents: contains 2 units

net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back



OFF! Moth Proofer 5

PRECAUTIONARY STATEMENTS

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EPA Reg. No. 4822-

EPA Est. No. 4822-WI-1

Unit Labeling

OFF! Moth Proofer 5

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EPA Est. No. 4822-WI-1

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BACK PANEL

OFF! Moth Proofer 5

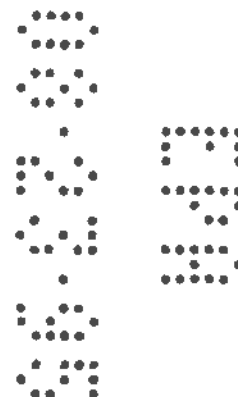
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U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

AUG 29 1995

S.C. JOHNSON & SON, INC
1525 HOWE ST
RACINE, WI 534035011

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 08/24/95. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your data submittal was found to be partially in compliance with the standards for submission of data contained in PR Notice 86-5, with the exceptions noted below. A copy of your transmittal bibliography is enclosed, annotated with the Master Record ID's (MRIDs) assigned to each document accepted. Please use these numbers in all future references to these documents. If deficiencies were found which apply to individual accepted studies, they are listed below following the applicable MRID. Any document which has been assigned a MRID has been accepted under PR Notice 86-5. If any comments related to a MRID appear on this report, they are provided for your information and reference when preparing future submissions. Some individual documents were not acceptable, and all copies are being returned to you for correction for the reasons indicated below. These rejected studies have been assigned separate identification numbers which are annotated on both the enclosed bibliography and the rejected document labels. The rejected studies and their deficiencies are described below.

Rejected study [01] :

A statement of compliance or non-compliance with the Good Laboratory Practices Standards contained in 40 CFR160 is required for all studies (except range finding studies and supplements to previously submitted studies) submitted to EPA. This statement must appear as page 3 of all studies, and must be signed and dated by the study sponsor, the study submitter, and the study director. Please see 40 CFR 160.12 for specific guidance.



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone (414) 631 2000

VIA FEDERAL EXPRESS

July 20, 1995

Ms. Janet Andersen
Acting Division Director of Biopesticides
and Pollution Prevention Division (7503W)
U.S. Environmental Protection Agency
Office of Pesticide Programs
2800 Jefferson Davis Highway
Arlington, VA 22202

437653-*pp*

Dear Ms. Andersen:

Re: OFF! Moth Proofer 5
EPA Reg. No. 4372-UUN

We are now submitting the necessary studies to complete our registration package for the above-mentioned registration. These studies were done non-glp based on discussions we had with Dwight Welch and the Off! Moth Proofer review team.

Also enclosed is a summary of each of the relevant toxicity categories for your information. This summary should also be given to the toxicologist reviewing the studies we are submitting.

Enclosed please find:

Toxicity Category Summary	
Confidential Statement of Formula	
5 copies of draft labeling	
3 copies of Primary eye irritation study	43765301
3 copies of Primary dermal irritation study	43765302
3 copies of acute oral toxicity evaluation	Reg (P1)
3 copies of fragrance ingredient toxicity and irritation evaluation	

Admin.

If you have any questions regarding this submission please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist
Enclosures



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone (414) 631-2000



VIA FEDERAL EXPRESS

July 20, 1995

Ms. Janet Andersen
Acting Division Director of Biopesticides
and Pollution Prevention Division (7503W)
U.S. Environmental Protection Agency
Office of Pesticide Programs
2800 Jefferson Davis Highway
Arlington, VA 22202

437653- *pp*

Dear Ms. Andersen:

Re: OFF! Moth Proofer 5
EPA Reg. No. 4822-UUN

We are now submitting the necessary studies to complete our registration package for the above-mentioned registration. These studies were done non-glp based on discussions we had with Dwight Welch and the Off! Moth Proofer review team.

Also enclosed is a summary of each of the relevant toxicity categories for your information. This summary should also be given to the toxicologist reviewing the studies we are submitting.

Enclosed please find:

Toxicity Category Summary	
Confidential Statement of Formula	
5 copies of draft labeling	43765301
3 copies of Primary eye irritation study	43765302
3 copies of Primary dermal irritation study	Reg (P1)
3 copies of acute oral toxicity evaluation	✓
3 copies of fragrance ingredient toxicity and irritation evaluation	Admin. ✓

If you have any questions regarding this submission please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist
Enclosures

Rejected

Studies



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY 18 1995

OFFICE OF PREVENTION,
PESTICIDES AND TOXIC
SUBSTANCES

S.C. Johnson & Son, Inc.
Attn: Geri L. Vander Leest
1525 Howe Street
Racine, WI 53403

Dear Ms. Vander Leest:

Subject: OFF! Moth Proofer 5
Amended Experimental Program
EPA Experimental Use Permit No. 4822-EUP-1
Effective Dates: May 8, 1995 to May 8, 1996
Quantity Authorized: 2700 Units, 2.133 lbs ai

*Amended EUP
in Thompson*

On the basis of the information furnished by the applicant and the annexed program, the subject Experimental Use Permit (EUP) under section 5 of the Federal Insecticide, Fungicide, and Rodenticide Act is hereby amended for the pesticide Lavande. Shipment and/or use under this Permit is subject to the provisions of 40 CFR Part 172.

PRIOR TO SHIPMENT AND/OR USE OF THIS MATERIAL, YOU MUST CONSULT WITH THE STATE PESTICIDE REGULATORY OFFICIALS OF THE STATES IN WHICH YOUR EXPERIMENTAL PROGRAM WILL BE CONDUCTED AND OBTAIN A STATE PERMIT OR LICENSE IF SUCH IS REQUIRED. YOU ARE TO NOTIFY THE STATE LEAD AGENCY OF THE STATES IN WHICH YOUR EXPERIMENTAL PROGRAM WILL BE CONDUCTED OF THE SPECIFIC TESTING PROGRAM (WHEN, WHERE, HOW MUCH, ETC.) ISSUANCE OF THIS FEDERAL PERMIT DOES NOT NEGATE THE NEED FOR PERMISSION FROM THE INDIVIDUAL STATES. FAILURE TO DO SO MAY RESULT IN REVOCATION OR MODIFICATION OF THIS EXPERIMENTAL USE PERMIT.

The amendment to this permit is to the Experimental Program, deleting the states of Iowa and Oklahoma and adding the states of North Carolina, Virginia, and Tennessee in Test #2. The amended permit also provides for a different distribution of product which involves no change in the total active ingredient nor the number of units distributed. (Copy of revised program attached.)

Reporting to the Agency any adverse reactions is required. The permit is still subject to the other conditions set out in this Experimental Use Permit issued May 8, 1995.

Sincerely,

for *Kara Chew*
Janet L. Andersen, Acting Director
Biopesticides and Pollution
Prevention Division (7501W)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY 18 1995

OFFICE OF PREVENTION,
PESTICIDES AND TOXIC
SUBSTANCES

S.C. Johnson & Son, Inc.
Attn: Geri L. Vander Leest
1525 Howe Street
Racine, WI 53403

Dear Ms. Vander Leest:

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SYMBOL	750112				
SURNAME	D. Wild	J. Chao			
DATE	5/18/95	18 May 95			

Reporting to the Agency any adverse reactions is required. The permit is still subject to the other conditions set out in this Experimental Use Permit issued May 8, 1995.

Sincerely,

for *Harv Chow*
Janet L. Andersen, Acting Director
Biopesticides and Pollution
Prevention Division (7501W)

MEMORANDUM TO THE FILES ON EXPERIMENTAL USE PERMITS

The following is a summary of information that describes a proposed EPA Experimental Use Permit (EUP) and includes comments by the reviewing product performance group and the Product Manager or his Assistant. This summary and the appropriate reviews from HED will accompany actions on EUPs to the Branch Chief and/or RD Director. If this is an extension, renewal, or amendment the form for the original EUP is to be attached. If an original form has never been prepared, attach a second form with items 1, 6, and 7 completed.

1. EPA EUP Number: 004822 EUP 1; X ORIGINAL, EXTENSION,
 RENEWAL, AMENDMENT

2. Name of Registrant S.C. Johnson

3. Chemical Name Lavandin Oil

4. Pests Clothes Moths

5. Proposed period of shipment 1 year from date of issuance

6. Program Requested

States	Units
CT	90
FL	190
GA	140
IL	140
IN	140
IA	90
LS	140
MD	140
MA	190
MN	90
MI	90
MO	140
NJ	90
OH	90
OK	140
PA	190
TX	140
WA	190
WI	140
DC	90

TOTALS

20

2700

7. EPA Pesticide Petition G, Proposing Tolerances
non-food use

H, Proposing Tolerances

8. Objective of Program: Development of Data: XProduct Performance; Res-
idue Chemistry; Environmental Fate; Other (specify)

9. Product performance group comments (Adequacy of program, data deficiency, etc.)

Program is acceptable. Revisions which can be submitted after acceptance include the system for determining adequate performance (we assume this is pass/fail), determination of the infestation (presumably by the technical representative from the company). If the product fails. We also assume that the toll-free number on the label will provide assistance to users should adverse effects to humans or domestic animals occur.

Is the number of acres and/or the amount or a.i. requested excessive for the program? no

Recommend to grant EUP: Yes x, No Efficacy Reviewer Phil Hutton



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

VIA FEDERAL EXPRESS
VIA FAX

RECEIVED
5/30/95
BPPD

D Welch
731

May 16, 1995

Mr. Phil Hutton
Product Manager 90
U.S. Environmental Protection Agency
Office of Biopesticides and Pollution
Prevention Division
2800 Jefferson Davis Highway
Arlington, VA 22202

ATTN: Dwight Welch

Dear Mr. Hutton:

Re: OFF! Moth Proofer 5
EPA Reg. No. 4822-UUN
EUP No. 4822-EUP-1

As a result of recent consumer survey data on the incidence of moth problem occurrence, we will need to make some changes in the test plan that we originally outlined for you.

We will be dropping the states of Washington, D.C., Iowa and Oklahoma because they had no reported moth problems in 1994 or their occurrence was too low to warrant any practical testing value. They have been replaced with the states of North Carolina, Virginia and Tennessee.

There have also been some quantity changes in the states but the total size and scope of the test will remain the same. Please see the attached sheet for the revisions that we are requesting.

If you have any questions regarding this submission please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist
Enclosures



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Phone: (414) 631-2000

VIA FEDERAL EXPRESS
VIA FAX

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Geri L. Vander Leest
Registration Specialist
Enclosures

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



United States

Environmental Protection Agency

Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

224728

Application for Pesticide - Section I

1. Company/Product Number 4822-EUP-1	2. EPA Product Manager Hutton	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) OFF! Moth Proofer 5	PM# 90	
5. Name and Address of Applicant (include ZIP Code) S. C. Johnson & Son, Inc. 1525 Howe Street Racine, WI 53403 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

See attached revisions to the planned testing program for OFF! Moth Proofer

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Geri L. Vander Leest	Title Registration Specialist	Telephone No. (include Area Code) (414) 631-3553
2. Signature <i>Geri L. Vander Leest</i>		6. Date Application Received (Stamped)
3. Title Registration Specialist		
4. Typed Name Geri L. Vander Leest		
5. Date 05/16/95		

PLANNED TESTING PROGRAM FOR OFFI MOTH PROOFER

REVISIONS

II TEST #2.

- Recent consumer survey data on the incidence of moth problem occurrence has necessitated some changes in the test plan as originally outlined.
- The first is in regard to the states themselves; specifically, Washington, D.C., Iowa, and Oklahoma were dropped either because they had no reported moth problems in 1994 or their occurrence was too low for these states to be of any practical testing value. They were replaced with North Carolina, Virginia, and Tennessee.
- The second is in regard to the quantities placed per state. In the original design, up to 90 units were planned for placements within each state. Given the new survey data, the number of placements per state has been adjusted to reflect the national distribution of moth problems, so that for some states the total number of placements increased because a higher moth problem incidence necessitated more households be included, while in other states the number of placements declined because lower incidences of moth occurrence were lower than expected.
- The total size and scope of the test, though, will not change; i.e., 1800 moth proofing units placed within 20 states, with no more than 4 units per household.

STATE	NUMBER OF UNITS OF PRODUCT TO BE PLACED PER STATE
CONNECTICUT	45
FLORIDA	72
GEORGIA	80
ILLINOIS	94
INDIANA	55
LOUISIANA	45
MARYLAND	65
MASSACHUSETTS	128
MINNESOTA	55
MICHIGAN	85
MISSOURI	51
NEW JERSEY	98
NORTH CAROLINA	68
OHIO	130
PENNSYLVANIA	201
TENNESSEE	73
TEXAS	200
VIRGINIA	96
WASHINGTON	55
WISCONSIN	94
TOTAL UNITS PLACED	1800

EUP Application.

5/16/95

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

224728

Application for Pesticide - Section I

1. Company/Product Number 4822-EUP-1	2. EPA Product Manager Hutton	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) OFF! Moth Proofer 5	PM# 90	
5. Name and Address of Applicant (Include ZIP Code) S. C. Johnson & Son, Inc. 1525 Howe Street Racine, WI 53403 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

See attached revisions to the planned testing program for OFF! Moth Proofer

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
If "Yes" Unit Packaging wgt. No. per container					
If "Yes" Package wgt. No. per container					
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Geri L. Vander Leest	Title Registration Specialist	Telephone No. (Include Area Code) (414) 631-3553
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature Geri L. Vander Leest	3. Title Registration Specialist	
4. Typed Name Geri L. Vander Leest	5. Date 05/16/95	

250

PAPERWORK REDUCTION ACT NOTICE and INSTRUCTIONS

PAPERWORK REDUCTION ACT NOTICE: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

INSTRUCTIONS: This form is to be used for all applications for new registration, and use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). (If not exempted by 40 CFR 152.81 (b) (4));
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper for submission or a mockup of the proposed label. If prepared for mockup, it should be constructed in a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registration that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size(s) of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** - Indicated the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

- 1-5. Self-explanatory.
6. EPA Use Only.

S. C. Johnson & Son, Inc.

Racine, Wisconsin U.S.A. 53403-2236

Worldwide Consumer Products
Research, Development & Engineering

FACSIMILE TRANSMISSION SHEET

TO: ATTENTION: Dwight Welch
COMPANY: _____
FACSIMILE PHONE NO: 703-308-7026NUMBER OF PAGES: 4
(Includes Transmission Sheet)

The information contained in this communication is **confidential**, and intended only for the use of the addressee. Unauthorized use, disclosure or copying is strictly prohibited. If you have received this communication in error, please immediately notify us, collect, at the contact number below, so that we can arrange for retrieval of the original document at our cost. Thank you.

FROM: Heidi Vander Zee
Regulatory Affairs & Registration GroupDATE: 5/16/95

MESSAGE:

I'm sending this package to you requesting revisions to our current approved EPA EUP per Chris Dineley.

Thank you so very much for turning around everything so quickly to us. It has been much appreciated.

I haven't gotten back to you lately since I've been so busy with the state issues on this EUP!! and other stuff.

Thanks again.

Heidi

P.S. These changes will not be implemented until we hear from you-- via fax.

If there are problems with this transmission, please telephone (414) 631-2622
OR Fax us at (414) 631-4718. Thank you.



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

VIA FEDERAL EXPRESS
VIA FAX

May 4, 1995

Mr. Phil Hutton
Product Manager 90
U.S. Environmental Protection Agency
Office of Biopesticides and Pollution
Prevention Division
2800 Jefferson Davis Highway
Arlington, VA 22202

ATTN: Dwight Welch

Dear Mr. Hutton:

Re: OFF! Moth Proofer 5
EPA Reg. No. 4822-UUN
EUP No. 4822-EUP-1

As a result of discussions with Dwight Welch regarding our EUP application for Off! Moth Proofer 5, we are resubmitting our basic confidential statement of formula as well as our label to reflect Lavandin Oil (CAS #8022-15-9) as our active ingredient. Lavandin Oil is on the approved inerts list, is Generally Recognized as Safe (GRAS) and is approved by FDA for food use.

Enclosed please find:

1. Revised CSF reflecting Lavandin Oil as our active ingredient.
2. Revised label also reflecting our active ingredient as Lavandin Oil. The percent of Lavandin Oil to be declared on the label will be 11.49.
3. Fragrance raw material monographs for Lavandin Oil for your information.

If you have any questions regarding this submission please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist
Enclosures

PLANNED TESTING PROGRAM FOR OFF! MOTH PROOFER**I. TEST #1.**

<u>STATE</u>	<u>NUMBER OF UNITS OF PRODUCT TO BE PLACED PER STATE</u>
FLORIDA	100
GEORGIA	50
ILLINOIS	100
INDIANA	50
LOUISIANA	50
MARYLAND	50
MASSACHUSETTS	100
MISSOURI	50
OKLAHOMA	50
PENNSYLVANIA	100
TEXAS	50
WASHINGTON	100
WISCONSIN	50
 	<hr/>
TOTAL UNITS PLACED	900

In total, there will be a maximum of 900 units placed in 225 households, for an average of 4 units per household.

PLANNED TESTING PROGRAM FOR OFF! MOTH PROOFER

Continued

II. TEST #2.

<u>STATE</u>	<u>NUMBER OF UNITS OF PRODUCT TO BE PLACED PER STATE</u>
CONNECTICUT	90
FLORIDA	90
GEORGIA	90
ILLINOIS	90
INDIANA	90
IOWA	90
LOUISIANA	90
MARYLAND	90
MASSACHUSETTS	90
MINNESOTA	90
MICHIGAN	90
MISSOURI	90
NEW JERSEY	90
OHIO	90
OKLAHOMA	90
PENNSYLVANIA	90
TEXAS	90
D. OF COLUMBIA	90
WASHINGTON	90
WISCONSIN	90
TOTAL UNITS PLACED	1800

In total, there will be a maximum of 1800 units placed in 450 households, for an average of 4 units per household.

Please note that the plan for this test is preliminary. The specific states have yet to be finalized. However, the size and scope of the test would be very similar to what is outlined above.

5/15/95


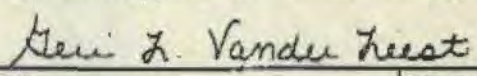
PLANNED TESTING PROGRAM FOR OFF! MOTH PROOFER

REVISIONS

II. TEST #2.

- Recent consumer survey data on the incidence of moth problem occurrence has necessitated some changes in the test plan as originally outlined.
- The first is in regard to the states themselves; specifically, Washington, D.C., Iowa, and Oklahoma were dropped either because they had no reported moth problems in 1994 or their occurrence was too low for these states to be of any practical testing value. They were replaced with North Carolina, Virginia, and Tennessee.
- The second is in regard to the quantities placed per state. In the original design, up to 90 units were planned for placements within each state. Given the new survey data, the number of placements per state has been adjusted to reflect the national distribution of moth problems, so that for some states the total number of placements increased because a higher moth problem incidence necessitated more households be included, while in other states the number of placements declined because lower incidences of moth occurrence were lower than expected.
- The total size and scope of the test, though, will not change; i.e., 1800 moth proofing units placed within 20 states, with no more than 4 units per household.

<u>STATE</u>	<u>NUMBER OF UNITS OF PRODUCT TO BE PLACED PER STATE</u>
CONNECTICUT	45
FLORIDA	72
GEORGIA	80
ILLINOIS	94
INDIANA	55
LOUISIANA	45
MARYLAND	65
MASSACHUSETTS	128
MINNESOTA	55
MICHIGAN	95
MISSOURI	51
NEW JERSEY	98
NORTH CAROLINA	68
OHIO	130
PENNSYLVANIA	201
TENNESSEE	73
TEXAS	200
VIRGINIA	96
WASHINGTON	55
WISCONSIN	94
TOTAL UNITS PLACED	1800

 <div style="display: inline-block; vertical-align: middle; text-align: center;"> United States ENVIRONMENTAL PROTECTION AGENCY Washington, DC 20460 </div>		OPP Identifier Number <div style="font-size: 24pt; font-weight: bold;">200847</div>
Office of Pesticides Programs (7505C) Application for Experimental Use Permit to Ship and Use a Pesticide for Experimental Purposes Only		
1. Type of Application <input checked="" type="checkbox"/> New <input type="checkbox"/> Amendment (See No. 2) <input type="checkbox"/> Extension (Give Permit Number below)	2. Briefly explain (attach a separate sheet if necessary) To assess the efficacy of a lavender mothproofers	
Permit Number	3. Name and Address of Firm/Person to Whom the Experimental Use Permit is to be issued (include Zip Code) (Type or Print) S. C. Johnson & Son, Inc. 1525 Howe St. Racine, WI 53403	
4. Name and Address of Shipper only if shipment is intended or if different from applicant's name and address (include Zip Code) (Type or Print)		5. Is Product Registered with EPA? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes (Give Registration Number or File Symbol below) Registration Number <u>4822-UUN</u> File Symbol _____
5. Name of Product Off Mothproofers 5	6. EPA Company Number	7. Total Quantity of Product Proposed for Shipment/Use Pounds of formulated product <u>9.94</u> Pounds of active ingredient <u>9.4</u>
8. Acreage or Area to be Treated 425 houses	9. Proposed Period of Shipment/Use May 22, 1995 - August 22, 1995	
10. Places from which Shipped Waxdale Manufacturing Plant Willow Road, Sturtevant, WI	11. Crop/Site to be Treated Clothing in closets, drawers, storage boxes, etc.	
12. Specify the name and number of the contact person most familiar with this application. Geri L. Vander Leest (414) 631-3553	13. Signature of Applicant or Authorized Firm Representative 	
14. Title Registration Specialist		15. Date Signed 4/19/95
Certification		
This is to certify that food or feed derived from the experimental program will not be used or offered for consumption or sale for consumption, except by laboratory or experimental animals, if illegal residues are present in or on such food or feed.		
I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment, or both, under applicable law.		
Below for EPA Use Only		
In any correspondence on this application, refer to this number:		Received by: EPA-OPP Registration Division Washington, DC 20460
Normal review time indicates that processing of this application should be completed by (date):		
Name of EPA Contact Person	Telephone Number	

5/8/95

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY 8 1995

OFFICE OF PREVENTION,
PESTICIDES AND TOXIC
SUBSTANCES

S.C. Johnson & Son, Inc.
Attn: Geri L. Vander Leest
1525 Howe Street
Racine, WI 53403

Dear Ms. Vander Leest:

Subject: OFF! Moth Proofer 5
EPA Experimental Use Permit No. 4822-EUP-1
Effective Dates: May 8, 1995 to May 8, 1996
Quantity Authorized: 2700 units, 2.133 lbs. a.i.

On the basis of the information furnished by the applicant and the annexed program, the subject Experimental Use Permit (EUP) under section 5 of the Federal Insecticide, Fungicide, and Rodenticide Act is hereby issued for the pesticide Lavandef. Shipment and/or use under this Permit is subject to the provisions of 40 CFR Part 172.

PRIOR TO SHIPMENT AND/OR USE OF THIS MATERIAL, YOU MUST CONSULT WITH THE STATE PESTICIDE REGULATORY OFFICIALS OF THE STATES IN WHICH YOUR EXPERIMENTAL PROGRAM WILL BE CONDUCTED AND OBTAIN A STATE PERMIT OR LICENSE IF SUCH IS REQUIRED. YOU ARE TO NOTIFY THE STATE LEAD AGENCY OF THE STATES IN WHICH YOUR EXPERIMENTAL PROGRAM WILL BE CONDUCTED OF THE SPECIFIC TESTING PROGRAM (WHEN, WHERE, HOW MUCH, ETC.) ISSUANCE OF THIS FEDERAL PERMIT DOES NOT NEGATE THE NEED FOR PERMISSION FROM THE INDIVIDUAL STATES. FAILURE TO DO SO MAY RESULT IN REVOCATION OR MODIFICATION OF THIS EXPERIMENTAL USE PERMIT.



CONCURRENCES

SYMBOL	75014							
SURNAME	<i>[Signature]</i>							
DATE	5/4/95							

Based upon the experimental program submitted, this product may be shipped for use under this permit to the following states, under two sets of tests.

TEST #1

<u>States</u>	<u>Units</u>
Florida	100
Georgia	50
Illinois	100
Indiana	50
Louisiana	50
Maryland	50
Massachusetts	100
Missouri	50
Oklahoma	50
Pennsylvania	100
Texas	50
Washington	100
Wisconsin	<u>50</u>
TOTAL UNITS	900

TEST #2

<u>States</u>	<u>Units</u>
Connecticut	90
Florida	90
Georgia	90
Illinois	90
Indiana	90
Iowa	90
Louisiana	90
Maryland	90
Massachusetts	90
Minnesota	90
Michigan	90
Missouri	90
New Jersey	90
Ohio	90
Oklahoma	90
Pennsylvania	90
Texas	90
Dist. of Columbia	90
Washington	90
Wisconsin	<u>90</u>
TOTAL UNITS	1800

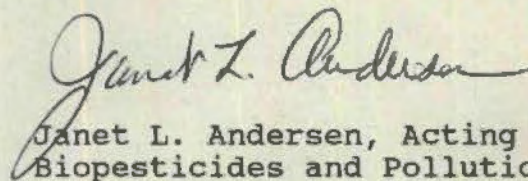
Reporting to the Agency any adverse reactions is required.

The labeling submitted in connection with the application for the Experimental Use Permit is acceptable and a stamped label is enclosed for your records. This labeling must be used for all shipments under this Experimental Use Permit and be in possession of the user at the time of application. Submit five (5) copies of the final printed labeling for our records.

Please submit a copy of the consumer questionnaire you will be using.

BPPD requests that if at any time during the EUP that adverse human effects are reported, then BPPD will be notified. Also the results of the eye irritation study should be submitted to BPPD for review as soon as possible after completion. If the toxicity category for this study is Tox Cat. II or I, the BPPD should be notified immediately.

Sincerely,

A handwritten signature in cursive script, reading "Janet L. Andersen". The signature is written in dark ink and is positioned above the typed name.

Janet L. Andersen, Acting Director
Biopesticides and Pollution
Prevention Division (7501W)



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

VIA FEDERAL EXPRESS
VIA FAX

May 4, 1995

Mr. Phil Hutton
Product Manager 90
U.S. Environmental Protection Agency
Office of Biopesticides and Pollution
Prevention Division
2800 Jefferson Davis Highway
Arlington, VA 22202

ATTN: Dwight Welch

Dear Mr. Hutton:

Re: OFF! Moth Proofer 5
EPA Reg. No. 4822-UUN
EUP No. 4822-EUP-1

As a result of discussions with Dwight Welch regarding our EUP application for Off! Moth Proofer 5, we are resubmitting our basic confidential statement of formula as well as our label to reflect Lavandin Oil (CAS #8022-15-9) as our active ingredient. Lavandin Oil is on the approved inerts list, is Generally Recognized as Safe (GRAS) and is approved by FDA for food use.

Enclosed please find:

1. Revised CSF reflecting Lavandin Oil as our active ingredient.
2. Revised label also reflecting our active ingredient as Lavandin Oil. The percent of Lavandin Oil to be declared on the label will be 11.49.
3. Fragrance raw material monographs for Lavandin Oil for your information.

If you have any questions regarding this submission please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist
Enclosures

Revised CSF /
Label. 5/4/95

Confidential Statement of Formula may be entitled to confidential treatment

FRONT PANEL

OFF! Moth Proofer 5

For Experimental Use Only

Not for Sale to any person other than a participant or cooperator of the EPA-approved Experimental Use Program

New

(Fresh) (Pleasant) Lavender Scent

Outdoor Fresh Scent

Spring Fresh Scent

Spring Breeze Scent

(Pleasant) (Fresh) Scent

(Country) Fresh Scent

Soft Sachet Scent

Floral Bouquet Scent

Sunshine (Fresh) Scent

(Pleasant) (Country) Spice Scent

(Fresh) Herbal Scent

(Effectively) controls moth problems with a pleasant scent

No unpleasant mothball smell

No harsh chemicals

No need to dry clean (or) (air out your) clothes (garments) after storage (use)

Protects clothes from moth damage

Keeps moths off clothes

Effective for one season

Lavender Formula

Protects clothes from (moth) damage for one (two) (three) (four) months (season long) (for one season)

Freshens closets (drawers) while protecting clothes from (moth) damage

Repels (kills) (controls) (moths) (moth eggs and larvae) (pupae) (which cause damage to clothes)

Easy to use

No mess

Convenient to use

Unique (clothes) (garment) protection (with a pleasant scent)

Not only protects (your) clothes, it freshens (your) closet (drawers)

Protects (your) clothes from moths (damage) with a (natural), fresh (pleasant) (lavender) scent

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Contains (number) (name) (hangers) (units) (fresheners)

Net Contents: contains 2 units

net wt. .22 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back

BACK PANEL

OFF! Moth Proofer 5

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. (Separate the two units.) Slowly remove foil label from the (fragrance) cartridge using peel tab. Do not remove or puncture white (clear) film protecting (colored) (fragrance) concentrate (gel). This film controls the release of concentrated (freshening) (protection) ingredients. (Insert cartridge into holder unit.)
2. This product can be placed inside drawers and storage boxes or hung in closets. Use one unit in smaller (average size) closets, drawers or boxes, two in larger closets, drawers or boxes (and close tightly). **Important:** For maximum effectiveness, closets, drawers or boxes must be kept as air tight as possible. Dry clean clothes (garments) (fabrics) before storing (Clean clothes (garments) (fabrics) before storing).
3. When the (fragrance) concentrate (gel) dries and cracks (turns to powder), this signals replacement time (for the cartridge). (Replace all (name) (units) every (one) (two) (three) (four) months (season)).

STORAGE: Store in a cool area away from children.

DISPOSAL: Wrap and put in trash collection.

OFF! Moth Proofer 5

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Avoid contact with skin or eyes. Wash hands thoroughly after handling.

STATEMENT OF PRACTICAL TREATMENT: IF SWALLOWED, DO NOT INDUCE VOMITING. Contact a physician or poison control center. Vomiting may cause aspiration pneumonitis. IF ON SKIN: remove with soap and water. If irritation persists, seek medical attention. IF IN EYES: flush eyes with plenty of water. If irritation persists, seek medical attention.

Questions? Comments? Call 800-558-5252 weekdays, 9-9 Eastern Time or Write Helen Johnson
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EPA EUP No. 4822-EUP-1

EPA Est. No. 4822-WI-1

Unit Labeling

OFF! Moth Proofer 5

Active Ingredient

Lavandin Oil 11.49%

Inert Ingredients 88.51%

Net Contents .11 oz. per unit

Keep Out Of Reach Of Children

CAUTION

See outer package for additional precautionary statements and complete directions

EPA EUP No. 4822-EUP-1

EPA Est. No. 4822-WI-1

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LAVANDIN OIL

Description and physical properties: EOA Spec. no. 41. The main constituent of lavandin oil is linalool (*Fenaroli's Handbook of Flavor Ingredients*, 1971).

Occurrence: Found in the plant *Lavandula hybrida* Reverchon (Fam. Labiatae).

Preparation: By steam distillation of the flowering stalks of *Lavandula hybrida* Reverchon (Gildemeister & Hoffman, 1961).

Uses: In public use since the 1900s. Use in fragrances in the USA amounts to approximately 500,000 lb/yr.

Concentration in final product (%):

	Soap	Detergent	Creams, lotions	Perfume
Usual	0.03	0.003	0.015	0.3
Maximum	0.3	0.03	0.1	1.2

Analytical data: Gas chromatogram, RIFM no. 242981; infra-red curve, RIFM nos 242981, 73-24.

Status

Lavandin oil was given GRAS status by FEMA (1965) and is approved by the FDA for food use (GRAS).

Biological data

Acute toxicity: Both the acute oral LD₅₀ value in rats and the acute dermal LD₅₀ value in rabbits exceeded 5 g/kg (Moreno, 1973).

Irritation: Undiluted lavandin oil applied to the backs of hairless mice and swine was not irritating (Urbach & Forbes, 1973). Applied full strength to intact or abraded rabbit skin for 24 hr under occlusion, it was slightly irritating (Moreno, 1973). Tested at 5% in petrolatum, it produced no irritation after a 48-hr closed-patch test on human subjects (Kligman, 1971).

Sensitization: A maximization test (Kligman, 1966; Kligman & Epstein, 1975) was carried out on 26 volunteers. The material was tested at a concentration of 5% in petrolatum and produced no sensitization reactions (Kligman, 1971).

Phototoxicity: No phototoxic effects were reported for undiluted lavandin oil on hairless mice and swine (Urbach & Forbes, 1973).

References

- Fenaroli's Handbook of Flavor Ingredients* (1971). Edited by T. E. Fura and N. Bellanca, p. 144. Chemical Rubber Co., Cleveland, Ohio.
- Flavoring Extract Manufacturers' Association (1965). Survey of flavoring ingredient usage levels. No. 2613. *Food Technol., Champaign* 19 (2), part 2, 155.
- Gildemeister, E. u. Hoffman, F. (1961) *Die Ätherischen Öle*. Vol. VII, p. 67. Akademie Verlag, Berlin.
- Kligman, A. M. (1966). The identification of contact allergens by human assay. III. The maximization test. A procedure for screening and rating contact sensitizers. *J. invest. Derm.* 47, 393.
- Kligman, A. M. (1971). Report to RIFM, 20 April.
- Kligman, A. M. & Epstein, W. (1975). Updating the maximization test for identifying contact allergens. *Contact Dermatitis* 1, 231.
- Moreno, O. M. (1973). Report to RIFM, 29 October.
- Urbach, F. & Forbes, P. D. (1973). Report to RIFM, 27 November.

S. C. Johnson & Son, Inc.

5/4/95 P.1
Racine, Wisconsin U.S.A. 53403-2236



**Worldwide Consumer Products
Research, Development & Engineering**

FACSIMILE TRANSMISSION SHEET

TO: ATTENTION: Dwight Wuech
COMPANY: US. EPA
FACSIMILE PHONE NO: 703-308-7026

NUMBER OF PAGES: 7
(Includes Transmission Sheet)

The information contained in this communication is confidential, and intended only for the use of the addressee. Unauthorized use, disclosure or copying is strictly prohibited. If you have received this communication in error, please immediately notify us, collect, at the contact number below, so that we can arrange for retrieval of the original document at our cost. Thank you.

FROM: Geri Vander Zee DATE: 5/3/94
Regulatory Affairs & Registration Group

MESSAGE:

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

*If there are problems with this transmission, please telephone (414) 631-2622
OR Fax us at (414) 631-4716. Thank you.*

Dwight:

~~JANET:~~

The permit is acceptable. I have a few comments which should go to Dwight for his information:

1. The attached jacket is not for the EUP. The appropriate materials should go into the EUP jacket (the application form, the label, the reviews, acceptance letter, etc). I could not find an application form. We need to make sure one exists. I can call SC Johnson and have them fax a copy.
2. There was no program review (review of section G in the jacket). This must be done for every permit and every extension that includes more sites or more material shipped. I have provided the boilerplate memorandum to the file which is the minimum type of review.
3. The signature page isn't in the best format. Will leave this up to you and whatever clerical assistance is available.

The company requests a call when signed

Jerri Vanderleest
414-631-3553

PLD

4/27/95

Product Ingredient Source information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Nov - Fos/He

OFFICE OF PREVENTION,
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

April 27, 1995

SUBJECT: Acute Toxicity Information Review and Summary (Primary)
OFF! Moth Proofer 5 [REDACTED]
EPA EUP Symbol: 4822-EUP-
Appl Date: April 19, 1995

FROM: Dwight A. Welch, Senior Biologist *Dwight Welch*
Biopesticides and Pollution Prevention Division 7501W

TO: Roy Sjoblad, *Microbiologist*
Biopesticides and Pollution Prevention Division 7501W

Background *POH*

The registrant has submitted an application for an Experimental Use Permit (EUP) for the above captioned product. The purpose of this permit is to gather field efficacy data and to assess any anecdotal toxicity complaints from users.

Each user will be given 4 units of the mothproofer. An estimated 1368 units will be placed for a total of 9.94 pounds. The product will be used in 22 states.

Product History

The product being tested has been used in Europe for 2 years without any substantial problems according to the company. One lavender variant sold in Spain contains 0.1% permethrin, yet no problems have been identified with the use of this product. In Italy and Argentina a product similar to the one to be used in the Experimental Program (without Permethrin) has been used without problem.

Factors Mitigating Toxic Exposure

The product is a 95% gel containing essential oils (perfumes) and 5% colorant and thickener in a plastic bubble pack with a semipermeable membrane on one side to release the oils at a slow rate of evaporation. Being that the product unit contains

only 3.3 grams and due to its bitter taste, oral toxicity is mitigated the low amount of product, the difficulty of removing the gel from the package, and its bad taste. Similarly, eye and skin effects would be mitigated by the low volume.

The slow rate of the evaporation makes the inhalation route of exposure an unlikely source of adverse toxicological reactions. The ingredients are released slowly and in a worse case scenario, reach a maximum concentration of 127 ppb. It is unlikely that such a concentration would be reached using this product, as the 127 ppb range was obtained from a heated source (Glade Plug-Ins). The mode of application (hanging product bubble packs in a closet or garment bag or storage chests or drawers) further reduces the likelihood that exposure would occur especially when compared with products which are sprayed or applied directly to a surface.

Carcinogenic Potential

[REDACTED] and [REDACTED] have been weakly linked to various tumors via the oral route of ingestion. Results produced were at dosages exceeding the Maximum Tolerated Dose for [REDACTED]. Due to the low volume of product, the difficulty in removing it from the packaging and the bitter taste, makes this route of exposure highly unlikely if not impossible.

The findings with regard to the [REDACTED] indicate a metabolic pathway specific to the rat (and not humans) an unlikely occurrence in humans. In addition to the low exposure information given above, [REDACTED] is a significant component in citrus fruit. Carcinogenicity has never been indicated by the widespread consumption of citrus fruits by the human populace.

Acute Toxicity

The assignment of Toxicity Category III (IV for Dermal LD50) seems to be supported by the data. The attached summary of the acute toxicity of the top ten components supports these classifications; however, the "Severe" rating for skin and eye irritation for [REDACTED] and the "Moderate" rating for skin and eye irritation for [REDACTED] gives cause for concern.

In testing [REDACTED] and [REDACTED] as solitary components, these eye and skin effects were reported. However, in the compounded fragrances similar to the subject product, the effects are greatly mitigated. The eye irritation is completely or nearly completely reversed after 7 days of exposure and skin irritation studies on human volunteers indicates no substantial skin irritation.

While the few studies submitted are a representative sampling, registrant indicates that there are many other similar

studies involving other compounded fragrances containing these components. Registrant has decided to send only the representative sampling and not bury our review of the product in numerous studies not necessarily needed. Registrant is willing to supplement the studies submitted with these additional studies if requested.

Labeling

The "HAZARDS TO HUMANS AND DOMESTIC ANIMALS" and the "STATEMENT OF PRACTICAL TREATMENT" sections of the labeling are supported by the information submitted.

Recommendations

1. Based upon the toxicity summary submitted / the Experimental Use Permit is supported.

and prior long term use in other countries without reported adverse effects

2. Based upon the toxicity summary submitted, the two pending applications for registration of [REDACTED] moth proofer products are also supported.

3. The toxicology data were in large part derived from monographs on FERRARIS RAW MATERIALS

4. ^{per} ~~DERMAL~~ ^{DERMAL} TOXICITY STUDIES WERE SUBMITTED BUT THE TEST MATERIALS WERE NOT IDENTIFIED. (ONLY IDENTIFIED; WE CAN DO

5. WERE REQUIREMENTS OF GULF 172 MET?

WHERE 4360; ETC...

State table

1534ES. EYE + SKIN IRRIT. TEST SUBSTANCE??

UNKNOWN - LABEL? - WARNING

SEND - COPY OF QUESTIONNAIRE??

W/ MONOMER IRRIT. STUDY (occlusive patch)

- I THINK WE NEED A LIST OF ALL THEIR INGREDIENTS. (273) IF 60 ON GSF? PHIL H.?

*SUMMARY
+ COMMENTS
LABEL STATEMENT
↓
ILLUSTRATION
TOX CAT. COMPARISON
↓
THEN RE INTO OUR
TOX CAT II for
eyes based on
their test.*

4/27/95

Inert ingredient information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION,
PESTICIDES AND TOXIC
SUBSTANCES

MEMORANDUM

April 27, 1995

SUBJECT: Acute Toxicity Information Review and Summary (Primary)
OFF! Moth Proofer 5 [REDACTED]
EPA EUP Symbol: 4822-EUP-
Appl Date: April 19, 1995

FROM: Dwight A. Welch, Senior Biologist
Biopesticides and Pollution Prevention Division 7501W

THRU: Roy Sjoblad
Biopesticides and Pollution Prevention Division 7501W

TO: Phil Hutton, Team Leader
Biopesticides and Pollution Prevention Division 7501W

Background

The registrant has submitted an application for an Experimental Use Permit (EUP) for the above captioned product. The purpose of this permit is to gather field efficacy data and to assess any anecdotal toxicity complaints from users. The use pattern is household mothproofing.

Each user will be given 4 units of the mothproofer. An estimated 1368 units will be placed for a total of 9.94 pounds. The product will be used in 22 states. (See attached program.)

Product History

The product being tested has been used in Europe for 2 years without any substantial problems according to the company. One lavender variant sold in Spain contains 0.1% permethrin, yet no problems have been identified with the use of this product. In Italy and Argentina a product similar to the one to be used in the Experimental Program (without Permethrin) has been used without problem.

Factors Mitigating Toxic Exposure

The product is a 95% gel containing essential oils (perfumes) and 5% colorant and thickener in a plastic bubble pack with a semipermeable membrane on one side to release the oils at a slow rate of evaporation. Oral toxicity from the experimental product is mitigated the low amount of product (3.3 grams), the difficulty of removing the gel from the package, and its bad taste. Similarly, eye and skin effects should be mitigated by the low volume.

The slow rate of the evaporation makes the inhalation route of exposure an unlikely source of adverse toxicological reactions. The ingredients are released slowly and in a worse case scenario, reach a maximum concentration of 127 ppb. It is unlikely that such a concentration would be reached using this product, as the 127 ppb range was obtained from a heated source (Glade Plug-Ins). The mode of application (hanging product bubble packs in a closet or garment bag or storage chests or drawers) further reduces the likelihood that exposure would occur especially when compared with products which are sprayed or applied directly to a surface.

Carcinogenic Potential

[REDACTED] and [REDACTED] have been weakly linked to various tumors via the oral route of ingestion. Results produced were at dosages exceeding the Maximum Tolerated Dose for [REDACTED]. Due to the low volume of product, the difficulty in removing it from the packaging and the bitter taste, makes this route of exposure highly unlikely if not impossible.

The findings with regard to the [REDACTED] indicate a metabolic pathway specific to the rat (and not humans) an unlikely occurrence in humans. In addition to the low exposure information given above, [REDACTED] is a significant component in citrus fruit. Carcinogenicity has never been indicated by the widespread consumption of citrus fruits by the human populace.

Acute Toxicity

The toxicology data were in large part derived from monographs on fragrance raw materials. The assignment of Toxicity Category III (IV for Dermal LD50) seems to be supported by the data. The attached summary of the acute toxicity of the top ten components supports these classifications; however, the "Severe" rating for skin and eye irritation for [REDACTED] and the "Moderate" rating for skin and eye irritation for [REDACTED] gives cause for concern.

In testing [REDACTED] and [REDACTED] as solitary components, these eye and skin effects were reported. However, in the compounded fragrances similar to the subject product, the effects are greatly mitigated. The eye irritation is completely or nearly completely reversed after 7 days of exposure and skin irritation studies on human volunteers indicates no substantial skin irritation.

While the few studies submitted are a representative sampling, registrant indicates that there are many other similar studies involving other compounded fragrances containing these components. Registrant has decided to send only the representative sampling and not bury our review of the product in numerous studies not necessarily needed. Registrant is willing to supplement the studies submitted with these additional studies if requested.

The registrant has initiated eye irritation studies for the subject product and will be submitting the results of these studies during the period of the permit.

Tolerances

The product is a non-food use and a tolerance is unnecessary.

Labeling

The "HAZARDS TO HUMANS AND DOMESTIC ANIMALS" and the "STATEMENT OF PRACTICAL TREATMENT" sections of the labeling are supported by the information submitted.

Recommendations

1. Based upon the toxicity summary submitted, and prior long term use in other countries without reported adverse effects, the Experimental Use Permit is supported.
2. The information/data presented is sufficient to allow BPPD to conclude that the exposure to the product in the EUP is not likely to cause any significant adverse effects; and a requirement for reporting of any effects to exposed people and domestic animals during the EUP can be used to support the lack of toxicity or to determine whether any additional tests may be needed for registration.
3. BPPD requests that if at any time during the EUP that adverse human effects are reported, then BPPD will be notified. Also the results of the eye irritation study should be submitted to BPPD for review as soon as possible after completion. If the toxicity category for this study is Tox Cat. II or I, the BPPD should be notified immediately.

EPA Meeting Agenda - August 23, 1995

Participants: Phil Hutton
John Tice
Roy Sjoblad
Leslie Lake, Senior Research Toxicologist
Geri Vander Leest, Registration Specialist

1. Off! Moth Proofer 5, EPA Reg.Symbol 4822-UUN

Background
Registration package submitted to EPA on July 20 (contained
necessary studies to complete registration package)
Exposure data
Tox data
Non-glp studies
Memo of Understanding (MOU) between EPA and CA
(data issues)
Precautionary Labeling
Not an aspiration hazard
Amended precautionary statement
Principle package and carton labeling
Any Other Related Issues

2. Moth Proofer #5 Active component - Lavandln oil

Approval as active ingredient
FDA - approved for food use
GRAS
Approved inerts list
Designation as reduced risk pesticide
Safer alternative to mothballs (p-DCB) and naphthalene
California concurrent review
Review by other states

3. Lemongrass/Cedarleaf Registrations

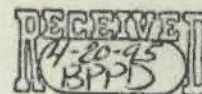
Status of Lemongrass (4822-UEN)
Toxicology findings
Status of Cedarleaf (4822-URI)

4. Closing Comments

4/19/95



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000



VIA FEDERAL EXPRESS

April 19, 1995

Ms. Janet Andersen
Acting Division Director of Biopesticides
and Pollution Prevention Division
U.S. Environmental Protection Agency
Office of Pesticide Programs
2800 Jefferson Davis Highway
Arlington, VA 22202

ATTN: Dwight Welch

Prints Gals
130
PC codes
040501

Dear Ms. Andersen:

Re: OFFI Moth Proofer 5
~~EPA Reg. No. 4822-UUN~~

needs EUP Application
Assigned

Enclosed please find three copies of our EUP Application and supporting documentation for Offi Moth Proofer 5.

This EUP Application and supporting documentation is being submitted to EPA per our meeting that we had with you on April 11, 1995.

The objective of our proposed testing program will be to:

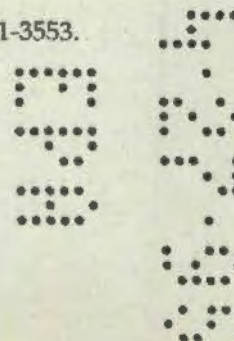
1. Acquire product performance data including product stability and efficacy data under conditions of actual use. Presently we have been limited to laboratory test conditions.
2. Obtain data regarding hazards to domestic animals (e.g. cats, dogs)
3. Obtain data regarding hazards to human health.

If you have any questions regarding this submission please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist
Enclosures



4/14/95



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

APR 14 1995

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Note to: Phil Hutton and Dwight Welch; From: Roy Sjoblad

Subject: Suggestion to S.C. Johnson, Co. on parameters for generic EUP for their fragrance-like moth repellent products.

On 4/11/95 Representatives of S.C. Johnson met with D. Welch, F. Toghrol, and R. Sjoblad to discuss requirements for Registration of two of their moth repellent products, and to discuss also their recently submitted EUP for other products.

The company wishes to test a number of fragrance-based moth proofing products in households, and a number of different dispensers are being considered. Among the parameters to be evaluated are any potential human responses/effects/reactions and product performance. Where appropriate, domestic pet effects/reactions also can be evaluated. Such information gathering is consistent with the EUP purpose of gathering information for registration of the pesticide.

From the verbal discussion by S.C. Johnson, it became apparent that there are mechanisms/procedures/practices in place to reasonably assure that human health would not be affected under the household testing scheme. These practices are in place and are used when S.C. Johnson tests non-pesticidal fragrance based products.

It was suggested to the company representatives that they should consider submitting these procedures to BPPD for review to determine whether they would be adequate to serve as conditions for an EUP program which would be generic for a group of fragrance based active ingredients and for a number of different devices.

Some of the information which would be included are the company practices and procedures and agreements the company follows to insure that the natural materials and inerts in the household-tested products are not toxic (i.e., acutely toxic, neurotoxic, teratogenic, etc.). Also, the information should include the generic label (or labels) intended for these types of products, the instructions provided to household residents for the testing, information to be gathered during the test, and the survey questions supplied to the household residents.

For any specific active ingredient, and product, the additional relevant information germane to the requirements at 40 CFR 172 shall be provided.

Assuming that BPPD and S.C. Johnson can reach agreement on the generic EUP program components, then for any new a.i.s and inerts and/or devices, the additional relevant information as set forth in 40 CFR 172 would be submitted for approval of the EUP. If the company wished to proceed to registration, then the survey results could be used to support registration along with any additional toxicology data the Agency felt appropriate.

This proposal, I believe represents a common-sense approach to the appropriate regulation of fragrance-based pesticide products, as it could relieve burden on the BPPD health effects reviewers, while still adequately protecting health. Further, it would not require us to register every a.i., device, etc., that the company wishes to test in households; and many of which might not ever proceed to the marketplace.

cc. F. Toghrol
R. Torla
J. Andersen
F. Chow

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 19 1995

OFFICE OF PREVENTION,
PESTICIDES AND TOXIC
SUBSTANCES

Geri L. Vander Leest
Leslie K. Lake
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403

SUBJECT: Applications for Pesticide Registration
OFF! Moth Proofer 1 (Cedarleaf)
EPA File Symbol: 4822-URI
OFF! Moth Proofer 2 (Cedarleaf)
EPA File Symbol: 4822-URO
OFF! Moth Proofer 3 (Lemongrass)
EPA File Symbol: 4822-UEN
OFF! Moth Proofer 4 (Lemongrass)
EPA File Symbol: 4822-UER
OFF! Moth Proofer 5 (Lavender)
EPA File Symbol: 4822-UNN
OFF! Moth Proofer 6 (Lavender)
EPA File Symbol: 4822-UUR
Appl. Date: June 10, 1994
Meeting Date: April 11, 1995

4/19/95
REVISED letter re
EUP.

Dear Ms. Vander Leest:

This letter supersedes our last letter re: 4822-UER, -URO.
Some of the questions posed in that letter were answered at our
meeting on April 11, 1995.

The applications (only 2 & 4 were extensively reviewed),
referred to above, submitted in connection with registration
under the Federal Insecticide, Fungicide, and Rodenticide Act, as
amended, are not acceptable for the following reasons:

Product Chemistry Review

The submitted Confidential Statement of Formula (CSF) and
Product Chemistry Data matrix ~~CONFIDENTIAL~~ acceptable, subject to the

SYMBOL	Following comments:					
SURNAME	<i>DeVill</i>	<i>DeVill</i>				
DATE	4/18/95	4/19/95				

It is preferred that the flash point be expressed in degrees Fahrenheit.

Our review of similarities to registered products indicate the following:

1. Cedarleaf Oil has been determined to be substantially similar to Cedarwood Oil, but is being considered a new active ingredient. The Federal Register Notice announcing your application was published on April 5, 1995.

2. Lemongrass Oil is an already recognized inert and active ingredient. Therefore, Lemongrass Oil is not considered to be new active ingredient.

3. Registrant cites acceptance of [REDACTED] in previously registered products (4822-279, -319): however, these products contain only [REDACTED] of the perfume while the subject products contain 10%--some 50 times more concentrated.

Based upon the MSD sheets on the components of these products, Product Chemistry referred the products for acute toxicity review. Of particular concern is the toxicity of the perfume and the toxicity of the Cedarleaf Oil.

Toxicity Review

1. The active ingredient in Off! Moth Proofer 4 is lemongrass (*Cymbopogon citratus*) oil, an essential oil which is generally recognized as safe (21 CFR 182.20).
2. According to a Material Safety Data Sheet (MSDS) submitted by the registrant, and Reregistration Eligibility Decision (RED) for Flower and Vegetable Oils (December 1993), lemongrass oil has an acute oral LD₅₀ greater than 5600 mg/kg in rats (Toxicity category IV). According to the MSDS, it may cause eye and skin irritation.
3. According to an MSDS submitted by the registrant, cedarleaf oil has an acute oral LD₅₀ greater than 830 mg/kg in rats (Toxicity category II). It may cause eye and skin irritation, according to the MSDS.
4. An MSDS submitted by the registrant for [REDACTED] (inert ingredient used in both products) indicates that [REDACTED]. The toxicity of this compound is not well defined. The MSDS stated that ingestion may cause serious health effects and inhalation may cause irritation, anesthetic effects, and nausea.
5. According to RED for Flower and Vegetable Oils (December 1993), there are currently two registered end-use products which contain 0.01 to 2.0 % lemongrass oil (active

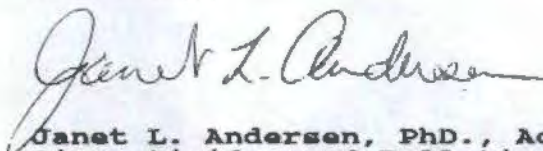
ingredient) as an impregnated solid material or as pellets used to repel cats and dogs. No data regarding indoor use.

The information provided is inadequate to allow us to set toxicity categories for the end-use products, and to allow for proper labelling. The registrant must submit acute oral, inhalation, dermal, and dermal irritation and dermal sensitization studies on each end-use product.

The Lavender Oil containing products are not pure lavender oil, but rather a compounded fragrance containing other ingredients, therefore, acute toxicity data for these products must be either submitted or referenced.

It may be in your best interest to submit information on the delivery rates for these products. The anticipated slow release rates may serve to mitigate the potential hazards from these products as does the low quantity of pesticide chemical in the ~~elaset~~ hanger products.

Sincerely,



Janet L. Andersen, PhD., Acting Director
Biopesticides and Pollution Prevention
Division

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 19 1995

OFFICE OF PREVENTION,
PESTICIDES AND TOXIC
SUBSTANCES

Geri L. Vander Leest
Leslie K. Lake
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403

SUBJECT: OFF! Compounded Perfume Experimental Use Permits (EUPs)
Meeting Date: April 11, 1995

Dear Ms. Vander Leest:

On April 11, 1995 you met with Dwight Welch, Freshteh Toghrol, and Roy Sjoblad of this division to discuss requirements for registration for the 6 OFF! moth repellent products. At this meeting you indicated that your company wishes to test a number of fragrance based moth proofing products in households, and a number of different dispensers used in conjunction with these products. There was discussion that EUPs, rather than registrations, would be more appropriate for the types of tests you wish to perform.

Among the parameters to be evaluated in the EUP are any potential human responses/effects/reactions and product performance. Where appropriate, domestic pet effects/reactions also can be evaluated. Such information gathering is consistent with the EUP purpose of gathering information for registration of a pesticide.

From this meeting we learned that S.C. Johnson has mechanisms/procedures/practices in place to reasonably assure that human health would not be adversely affected under a household testing scheme. These same practices are in place to test non-pesticidal fragrance based products. These procedures should be submitted to determine whether they would be adequate to serve as conditions for an EUP program.

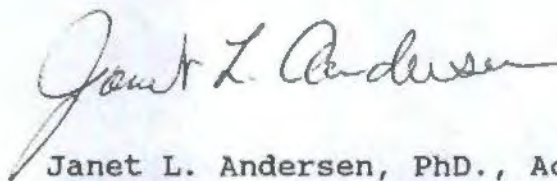
In addition to the procedures, you should submit information on the toxicity of the products, generic label (or labels) intended for these types of products/uses, the instructions provided to household residents for the testing, information to

SYMBOL	7501W	7501W					
SURNAME	Welch	Sjoblad					
DATE	4/18/95	4/19/95					

be gathered during the test, and the survey questions supplied to the household residents. Additional information on the submission can be found in 40 CFR Section 172.

We believe this proposal to be a common sense approach to this situation. By not having to register every product/device type to be tested, the resources of both S.C. Johnson and the Agency will be conserved. S.C. Johnson would not need to register products which may never be marketed, while at the same time relieving the burden on the Agency's scientific review time. Yet this proposal still provides for adequately protecting human health and the environment.

Sincerely,

A handwritten signature in cursive script, reading "Janet L. Andersen". The signature is written in dark ink and is positioned above the typed name and title.

Janet L. Andersen, PhD., Acting Director
Biopesticides and Pollution Prevention
Division

Product ingredient source information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

03/14/95

GERI L. VANDER LEEST
S.C. JOHNSON & SON INC.
1525 HOWE STREET
RACINE WI 53403

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PRODUCT NAME: OFF! MOTH PROOFER 5
COMPANY NAME: S.C. JOHNSON & SON INC.
OPP IDENTIFICATION NUMBER: 239751
EPA FILE SYMBOL: 4822-UUN
EPA RECEIPT DATE: 03/08/95

SUBJECT: RECEIPT OF APPLICATION FOR A NEW ME-TOO REGISTRATION

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for a new 'me-too' registration and it has passed an administrative screen for completeness.

During the initial screen we determined that the application qualifies for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability.

If you have any questions, please contact Phil Hutton, Product Manager 90, at (703)-308-8260.

RECEIVED
Regulatory Affairs
and Registration Group

MAR 16 1995

Sincerely,

J. W. Hutton

Front End Processing Staff
Information Services Branch
Program Management and Support Division

*Front End Letter
also receipt of
Application*

MAR 10 1995

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

S.C. JOHNSON & SON, INC
1525 HOWE ST
RACINE, WI 534035011

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 03/08/95. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

The data accompanying your application have passed our initial screen for compliance with the standards for data submission contained in PR Notice 86-5. A copy of your transmittal bibliography is enclosed, annotated with the Master Record ID's (MRIDs) we assigned to each document. Please use these numbers in all future references to these documents. Thanks for your cooperation.



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

435742-

VIA FEDERAL EXPRESS

March 6, 1995

Ms. Janet Andersen
Product Manager 90
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Ms. Andersen:

APPLICATION

Re: OFF! Moth Proofer 5
EPA Reg. No. 4822-

Please find attached an Application for Pesticide Registration for OFF! Moth Proofer 5. is a compounded lavender fragrance which contains oil of lavender, which is on the EPA approved inert list.

We understand that the EPA may eventually exempt oil of lavender from registration, but at the current time we need this registration to begin consumer testing of the product this season.

We are enclosing a product chemistry package for your review. We are requesting data waivers for all remaining data requirements based on the fact that this is a non-food use product. Criteria for waivers per 40 C.F.R. Part 158.45 are the non-toxic mode of pesticidal activity, negligible human and environmental exposure as a result of use as a pesticide and lack of adverse effects reports.

Product ingredient source information may be entitled to confidential treatment

March 6, 1995

Page 2

Our moth repellent dispenser dispenses, via membrane, only minute amounts of evaporative vapors of the moth repellent into the protective space. This substance poses little or no risk to human health or the environment. Exposure to non-pesticidal uses of these oils is generally greater than would be exposure to these substances when used in enclosed spaces as moth repellents. This product is very similar to our Glade Clip-On air freshener. See enclosed sample.

The precedent has been set by EPA in the registration of Moth-Away Herbal Moth Repellent, EPA Reg. No. 33112-1.

The perfume breakdown for [REDACTED] which we will be using will be sent to you via [REDACTED] as soon as we find out what our EPA file symbol will be for this product.

In summary, S. C. Johnson & Son, Inc. respectfully requests the EPA to waive all additional data requirements of 40 C.F.R. Part 158 in accordance with 40 C.F.R. Part 158.45.

Included with this submission are:

- Application for Pesticide Registration
- Confidential Statement of Formula
- Data Matrix
- Formulators Exemption
- Certification with Respect to Citation of Data
- 5 copies of draft labeling
- 3 copies of Chemistry Data

43574201

If you have any questions concerning this submission please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist

Enclosures



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

VIA FEDERAL EXPRESS

March 6, 1995

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Product Manager 90
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk
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March 6, 1995

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If you have any questions concerning this submission please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist

Enclosures



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

239751

Application for Pesticide - Section I

1. Company/Product Number 4822	2. EPA Product Manager Andersen	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) OFF! Moth Proofer 5	PM# 90	
5. Name and Address of Applicant (Include ZIP Code) S.C. Johnson & Son, Inc. 1535 Howe Street Racine, WI 53403-2236 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 33122-1 Product Name Moth Away Herbal Moth Repellent	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

New Registration.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container .01 - 1 oz. 1 - 4 units		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Geri L. Vander Leest		Title Registration Specialist	
		Telephone No. (Include Area Code) 414-631-3553	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature Geri L. Vander Leest		3. Title Registration Specialist	
4. Typed Name Geri L. Vander Leest		5. Date 03/06/95	

297

Product ingredient source information may be entitled to confidential treatment

SOURCE OF CHEMISTRY DATA TO SUPPORT NEW REGISTRATION

1. PRODUCT NAME: Off! Moth Proofer 5		2. EPA REG.NO/FILE SYMBOL 4822-		3. FORMULATOR'S EXEMPTION SELECTED YES <u>X</u> NO <u> </u>		4. PAGE <u>1</u> OF <u>2</u>		
5. APPLICANT'S NAME AND ADDRESS		6. APPLICATION FOR REGISTRATION DATED 3 6 95 Mo. Day Yr.		7. NAME OF ACTIVE INGREDIENT(S): <div style="background-color: black; width: 150px; height: 20px;"></div>				
8. DATA REQUIREMENTS		9. SOURCE OF DATA SATISFYING REQUIREMENTS						10. MRID NUMBER
8a. 40CFR Part 158/ Guideline Number	8b. Name of Test	9a. Submitted by Applicant	9b. Date Submitted	9c. Submitted by another person/firm (name)	9d. Letter of Authorization	9e. Public Literature	9f. N. A. or Waiver or other (explain)	EPA ACCESSION NUMBER OR OTHER EPA IDENTIFYING NUMBER
158.150-158	190 PRODUCT CHEMISTRY							
61-1	Product identity		3/6/95					
61-2	Manufacturing process		3/6/95					
61-3	Discussion of formation of impurities						NA	
62-1	Preliminary analysis						NA	
62-2	Certification of limits		3/6/95					
62-3	Analytical methods		3/6/95					
63-2	Color		3/6/95					
63-3	Physical state		3/6/95					
63-4	Odor		3/6/95					
63-5	Melting point		NA - product is not a solid				NA	
63-6	Boiling point		NA - product is not a liquid				NA	
63-7	Density, bulk-density, or specific gravity		3/6/95					

Product ingredient source information may be entitled to confidential treatment

SOURCE OF CHEMISTRY DATA TO SUPPORT NEW REGISTRATION

1. PRODUCT NAME: Off! Moth Proofer		2. EPA REG.NO/FILE SYMBOL 4822-		3. FORMULATOR'S EXEMPTION SELECTED YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		4) PAGE <u>2</u> OF <u>2</u>		
5. APPLICANT'S NAME AND ADDRESS		6. APPLICATION FOR REGISTRATION DATED 3 6 95 Mo. Day Yr.		7. NAME OF ACTIVE INGREDIENT(S): <div style="background-color: black; width: 150px; height: 20px; margin: 5px 0;"></div>				
8. DATA REQUIREMENTS		9. SOURCE OF DATA SATISFYING REQUIREMENTS						10. MRID NUMBER
8a. 40 CFR Part 158/ Guideline Number	8b. Name of Test	9a. Submitted by Applicant	9b. Date Submitted	9c. Submitted by another person/firm (name)	9d. Letter of Authorization	9e. Public Literature	9f. N. A. or Waiver or other (explain)	EPA ACCESSION NUMBER OR OTHER EPA IDENTIFYING NUMBER
158,150-158 .190 PRODUCT CHEMISTRY (CONTINUED)								
63-8	Solubility		Insoluble in water				NA	
63-9	Vapor Pressure		NA - Not required for end-use product				NA	
63-10	Dissociation constant		NA - Not required for end-use product				NA	
63-11	Octanol/water partition coefficient		NA - Not required for end-use product				NA	
63-12	pH		NA				NA	
63-13	Stability		3/6/95					
63-14	Oxidizing/reducing reaction		Product does not contain any oxidizing or reducing agents.					
63-15	Flammability		3/6/95					
63-16	Explosibility		Product does not contain any explosive materials NA					
63-17	Storage stability		NA - Not required for end-use product NA					
63-18	Viscosity		3/6/95					
63-19	Miscibility		NA - product is non-dilutable NA					
63-20	Corrosion Characteristics		Product is non corrosive NA					
63-21	Dielectric breakdown voltage		NA - Product is not directed for use around electrical outlets					

Product ingredient source information may be entitled to confidential treatment

SOURCE OF ACUTE TOXICOLOGY DATA TO SUPPORT NEW REGISTRATION

1. PRODUCT NAME: Off! Moth Proofer 5		2. EPA REG.NO/FILE SYMBOL 4822-		3. FORMULATOR'S EXEMPTION SELECTED YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		4) PAGE <u>1</u> OF <u>1</u>		
5. APPLICANT'S NAME AND ADDRESS S. C. Johnson & Son, Inc. 1525 Howe St. Racine, WI 53403		6. APPLICATION FOR REGISTRATION DATED 3 6 95 Mo. Day Yr.		7. NAME OF ACTIVE INGREDIENT(S): <div style="background-color: black; width: 150px; height: 20px;"></div>				
8. DATA REQUIREMENTS		9. SOURCE OF DATA SATISFYING REQUIREMENTS						10. MRID NUMBER
8a. 40CFR Part 158/ Guideline Number	8b. Name of Test	9a. Submitted by Applicant	9b. Date Submitted	9c. Submitted by another person/firm (name)	9d. Letter of Authorization	9e. Public Literature	9f. N. A. or Waiver or other (explain)	EPA ACCESSION NUMBER OR OTHER EPA IDENTIFYING NUMBER
" 158.340	ACUTE TOXICOLOGY							
81-1	Acute oral LD-50,rat						Waiver	
81-2	Acute dermal LD-50						Waiver	
81-3	Acute Inhalation LC-50,rat						Waiver	
81-4	Primary eye irritation rabbit						Waiver	
81-5	Primary dermal irritation						Waiver	
81-6	Dermal sensitization						Waiver	

FORMULATOR'S EXEMPTION STATEMENT
(40 CFR 152.85)

EPA File Symbol/Reg. No. 4822-

Product Name:

Applicant's Name and Address

S. C. Johnson & Son Inc.

1525 Howe St.

Racine, Wi. 53403

As an authorized representative of the applicant for registration of the product identified above, I hereby certify that:

(1) This product contains the active ingredient(s):

[REDACTED]

(2) Each active ingredient listed in paragraph (1) is present solely as the result of the incorporation into the product (during formulation or packaging) of another product which contains that active ingredient, which is registered under FIFRA sec. 3, and which is purchased by us from another producer.

(3) Indicate by circling (A) or (B) below which paragraph applies:

(A) An accurate Confidential Statement of Formula (EPA Form 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number and product name, the source of the active ingredient(s) listed in paragraph (1).

(or)

(B) The Confidential Statement of Formula dated _____ on file with the EPA is complete, current and accurate and contains the information required on the current CSF Form No. 8570-4. The registered source(s) of the active ingredient(s) listed in paragraph (1) is/are listed below:

Active ingredient

[REDACTED]

Source: Product name and Reg. No.

[REDACTED]

Signature

Geri A. Vander Zee

Date March 6, 1995_

Title

Registration Specialist

EPA Form

(April 1985)

Product ingredient source information may be entitled to confidential treatment

	United States Environmental Protection Agency Washington DC 20460	Form Approved OMB No. 2070-0060 Approval expires 9/30/90
	Certification with Respect to Citation of Data	
Applicant's Name and Address: S. C. Johnson & Son Inc. 1525 Howe St. Racine WI. 53403	EPA File Symbol/Registration Number: 4822	
	Product Name: Off! Moth Proofer 5	
	Date of Application: 3/6/95	

1. This application is supported by all data submitted or cited in the application. In addition, if cite-all options are indicated, this application is supported by all data in the Agency's files that concern the properties or effects of this product or of any other product that is identical or substantially similar, and that is one of the types of data that would be required to be submitted if this application sought the initial registration of a product of identical or similar composition and intended uses under the data requirements in effect on the date of approval of this application.

2. I certify that, for each study cited in support of this application for registration that is an exclusive use study, I am the original data submitter, or have obtained the written permission of the original data submitter to cite that study.

3. I certify that, for each study cited in support of this application for registration that is not an exclusive use study:

I am the original data submitter; or I have obtained the written permission of the original data submitter to cite that study; or

I have notified in writing the companies who have submitted data I have cited to support this application and have offered to: (a) Pay compensation for those data in accordance with section 3(c)(1)(D) and 3(c)(2)(D) of the Federal Insecticide, Fungicide and Rodenticide Act; and (b) Commence negotiations to determine which data are subject to the compensation requirement of FIFRA and the amount and terms of compensation due, if any. The companies I have notified are: (Check one)

☐ All companies listed on the Pesticide Data Submitters List for all active ingredients contained in my product (cite-all method or cite-all option under Selective Method). (Also sign the General Offer to pay Statement below.)

☒ Those companies who have submitted the studies which I have cited (Selective method).

Signature	Name and Title	Date
<i>Geri L. Vander Leest</i>	Geri L. Vander Leest Registration Specialist	3/6/95

General Offer To Pay: I hereby offer and agree to pay compensation to other persons, with regard to the approval of this application, to the extent required by FIFRA sec. 3(c)(1)(D) and 3(c)(2)(D).

Signature	Name and Title	Date

FAST TRACK

Expedited Processing

NEW REGISTRATION OR NEW EUP

App # 239757

FAST TRACK * APPLICATION FOR NEW REGISTRATION

WITH DATA

	Init.	Date
FEU	<u>fw</u>	<u>3-9-95</u>
Fileroom/PRDTS	<u>TBJ</u>	<u>3-9-95</u>
SIG (DATA)	<u>RQ</u>	<u>3/13/95</u>
Fileroom/PRDTS	<u>TBJ</u>	<u>3-13-95</u>
FEU	<u>fw</u>	<u>3-13-95</u>
Fileroom/PRDTS	<u>EWB</u>	<u>3-15-95</u>
PM	_____	_____

NO DATA

	Init.	Date
FEU	_____	_____
Fileroom/PRDTS	_____	_____
PM	_____	_____

REGULAR APPLICATION FOR NEW REGISTRATION OR EXPERIMENTAL USE PERMIT

Includes new petition for tolerance: YES or NO

WITH DATA

	Init.	Date
FEU	_____	_____
Fileroom/PRDTS	_____	_____
SIG (DATA)	_____	_____
Fileroom/PRDTS	_____	_____
PM	_____	_____

NO DATA

	Init.	Date
FEU	_____	_____
Fileroom/PRDTS	_____	_____
PM	_____	_____

- * Front End Processing determined this application qualifies for fast track review based on registrants claim of "me-too". No screen for substantial similarity is made by the Front End.

FRONT END PROCESSING APPLICATION INFORMATION CHECK

3-9-95
expt# 739757

PM

✓90

EPA COMPANY NUMBER

14822-UUN

EPA REGISTRATION NUMBER
STATUS (For Amendments)

Active

Cancelled

Not in REFS

"ME-TOO" CITED PRODUCT STATUS

Active

Cancelled

Not in REFS

PRAT RECORD CREATED

✓



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

03/14/95

GERI L. VANDER LEEST
S.C. JOHNSON & SON INC.
1525 HOWE STREET
RACINE WI 53403

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PRODUCT NAME: OFF! MOTH PROOFER 5
COMPANY NAME: S.C. JOHNSON & SON INC.
OPP IDENTIFICATION NUMBER: 239751
EPA FILE SYMBOL: 4822-UUN
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If you have any questions, please contact Phil Hutton, Product Manager 90, at (703)-308-8260.

Sincerely,

A handwritten signature in cursive script, likely belonging to Phil Hutton.

Front End Processing Staff
Information Services Branch
Program Management and Support Division

MAR 10 1995

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

S.C. JOHNSON & SON, INC
1525 HOWE ST
RACINE, WI 534035011

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S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

435742-*EP*

VIA FEDERAL EXPRESS

March 6, 1995

Ms. Janet Andersen
Product Manager 90
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk
Room 266A, Crystal Mall 2
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Product ingredient source information may be entitled to confidential treatment

March 6, 1995

Page 2

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- Confidential Statement of Formula
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A357A201

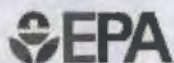
If you have any questions concerning this submission please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist

Enclosures



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

239751

Application for Pesticide - Section I

1. Company/Product Number 4822 - UUN	2. EPA Product Manager Andersen	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) OFF! Moth Proofer 5	PM# 90	
5. Name and Address of Applicant (Include ZIP Code) S.C. Johnson & Son, Inc. 1525 Howe Street Racine, WI 53403-2236 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 33112-1 Product Name Moth Away Herbal Moth Repellent	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

New Registration.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
If "Yes" Unit Packaging wgt. No. per container			If "Yes" Package wgt. No. per container	<input checked="" type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container .01 - 1 oz. 1 - 4 units		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Geri L. Vander Leest		Title Registration Specialist		Telephone No. (Include Area Code) 608-631-3553	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature Geri L. Vander Leest		3. Title Registration Specialist			
4. Typed Name Geri L. Vander Leest		5. Date 03/06/95			

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PAPERWORK REDUCTION ACT NOTICE and INSTRUCTIONS

PAPERWORK REDUCTION ACT NOTICE: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

INSTRUCTIONS: This form is to be used for all applications for new registration, end use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). [If not exempted by 40 CFR 152.81 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper for submission or a mockup of the proposed label. If prepared for mockup, it should be constructed in a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registration that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.


1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size(s) of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** - Indicate the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "not-to-be" reregistration, etc.

- 1-5. Self-explanatory.
6. EPA Use Only.

	United States Environmental Protection Agency Washington DC 20460	Form Approved OMB No. 2070-0060 Approval expires 9/30/90
	Certification with Respect to Citation of Data	
Applicant's Name and Address: S. C. Johnson & Son Inc. 1525 Howe St. Racine WI. 53403	EPA File Symbol/Registration Number: 4822-UUN	
	Product Name: Off! Moth Proofer 5	
	Date of Application: 3/6/95	

1. This application is supported by all data submitted or cited in the application. In addition, if cite-all options are indicated, this application is supported by all data in the Agency's files that concern the properties or effects of this product or of any other product that is identical or substantially similar, and that is one of the types of data that would be required to be submitted if this application sought the initial registration of a product of identical or similar composition and intended uses under the data requirements in effect on the date of approval of this application.

2. I certify that, for each study cited in support of this application for registration that is an exclusive use study, I am the original data submitter, or have obtained the written permission of the original data submitter to cite that study.

3. I certify that, for each study cited in support of this application for registration that is not an exclusive use study:

I am the original data submitter; or I have obtained the written permission of the original data submitter to cite that study; or

I have notified in writing the companies who have submitted data I have cited to support this application and have offered to: (a) Pay compensation for those data in accordance with section 3(c)(1)(D) and 3(c)(2)(D) of the Federal Insecticide, Fungicide and Rodenticide Act; and (b) Commence negotiations to determine which data are subject to the compensation requirement of FIFRA and the amount and terms of compensation due, if any. The companies I have notified are: (Check one)

☐ All companies listed on the Pesticide Data Submitters List for all active ingredients contained in my product (cite-all method or cite-all option under Selective Method). (Also sign the General Offer to pay Statement below.)

☒ Those companies who have submitted the studies which I have cited (Selective method).

Signature <i>Geri L. Vander Leest</i>	Name and Title Geri L. Vander Leest Registration Specialist	Date 3/6/95
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General Offer To Pay: I hereby offer and agree to pay compensation to other persons, with regard to the approval of this application, to the extent required by FIFRA sec. 3(c)(1)(D) and 3(c)(2)(D).

Signature	Name and Title	Date

SOURCE OF CHEMISTRY DATA TO SUPPORT NEW REGISTRATION

1. PRODUCT NAME: Off! Moth Proofer 5		2. EPA REG.NO/FILE SYMBOL 4822- <u>UUN</u>		3. FORMULATOR'S EXEMPTION SELECTED YES <u>X</u> NO <u> </u>		4. PAGE <u>1</u> OF <u>2</u>		
5. APPLICANT'S NAME AND ADDRESS		6. APPLICATION FOR REGISTRATION DATED 3 6 95 Mo. Day Yr.		7. NAME OF ACTIVE INGREDIENT(S): <div style="background-color: black; width: 150px; height: 20px; margin: 5px 0;"></div>				
8. DATA REQUIREMENTS		9. SOURCE OF DATA SATISFYING REQUIREMENTS						10. MRID NUMBER
8a. 40CFR Part 158/ Guideline Number	8b. Name of Test	9a. Submitted by Applicant	9b. Date Submitted	9c. Submitted by another person/firm (name)	9d. Letter of Authorization	9e. Public Literature	9f. N. A. or Waiver or other (explain)	EPA ACCESSION NUMBER OR OTHER EPA IDENTIFYING NUMBER
158.150-158 .190 PRODUCT CHEMISTRY								
61-1	Product identity		3/6/95					
61-2	Manufacturing process		3/6/95					
61-3	Discussion of formation of impurities						NA	
62-1	Preliminary analysis						NA	
62-2	Certification of limits		3/6/95					
62-3	Analytical methods		3/6/95					
63-2	Color		3/6/95					
63-3	Physical state		3/6/95					
63-4	Odor		3/6/95					
63-5	Melting point		NA - product is not a solid				NA	
63-6	Boiling point		NA - product is not a liquid				NA	
63-7	Density, bulk-density, or specific gravity		3/6/95					

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SOURCE OF CHEMISTRY DATA TO SUPPORT NEW REGISTRATION

1. PRODUCT NAME: Off! Moth Proofer		2. EPA REG.NO/FILE SYMBOL 4822- <u>UUN</u>		3. FORMULATOR'S EXEMPTION SELECTED YES <u>X</u> NO <u> </u>		4) PAGE <u>2</u> OF <u>2</u>	
5. APPLICANT'S NAME AND ADDRESS		6. APPLICATION FOR REGISTRATION DATED 3 6 95 Mo. Day Yr.		7. NAME OF ACTIVE INGREDIENT(S): <div style="background-color: black; width: 150px; height: 20px; margin-top: 5px;"></div>			
8. DATA REQUIREMENTS		9. SOURCE OF DATA SATISFYING REQUIREMENTS					
8a. 40 CFR Part 158/ Guideline Number	8b. Name of Test	9a. Submitted by Applicant	9b. Date Submitted	9c. Submitted by another person/firm (name)	9d. Letter of Authorization	9e. Public Literature	9f. N. A. or Waiver or other (explain)
158.150-158.190 PRODUCT CHEMISTRY (CONTINUED)							
63-8	Solubility		Insoluble in water				NA
63-9	Vapor Pressure		NA - Not required for end-use product				NA
63-10	Dissociation constant		NA - Not required for end-use product				NA
63-11	Octanol/water partition coefficient		NA - Not required for end-use product				NA
63-12	pH		NA				NA
63-13	Stability		3/6/95				
63-14	Oxidizing/reducing reaction		Product does not contain any oxidizing or reducing agents.				
63-15	Flammability		3/6/95				
63-16	Explosibility..		Product does not contain any explosive materials NA				
63-17	Storage stability		NA - Not required for end-use product NA				
63-18	Viscosity: ...		3/6/95				
63-19	Miscibility		NA - product is non-dilutable NA				
63-20	Corrosion Characteristics		Product is non corrosive NA				
63-21	Dielectric breakdown voltage		NA - Product is not directed for use around electrical outlets				

Product ingredient source information may be entitled to confidential treatment

SOURCE OF ACUTE TOXICOLOGY DATA TO SUPPORT NEW REGISTRATION

1. PRODUCT NAME: Off! Moth Proofer 5		2. EPA REG.NO/FILE SYMBOL 4822- <u>UUN</u>		3. FORMULATOR'S EXEMPTION SELECTED YES <u>X</u> NO _____		4) PAGE <u>1</u> OF <u>1</u>		
5. APPLICANT'S NAME AND ADDRESS S. C. Johnson & Son, Inc. 1525 Howe St. Racine, WI 53403		6. APPLICATION FOR REGISTRATION DATED 3 6 95 Mo. Day Yr.		7. NAME OF ACTIVE INGREDIENT(S): <div style="background-color: black; width: 150px; height: 20px;"></div>				
8. DATA REQUIREMENTS		9. SOURCE OF DATA SATISFYING REQUIREMENTS						10. MRID NUMBER
8a. 40CFR Part 158/ Guideline Number	8b. Name of Test	9a. Submitted by Applicant	9b. Date Submitted	9c. Submitted by another person/firm (name)	9d. Letter of Authorization	9e. Public Literature	9f. N. A. or Waiver or other (explain)	EPA ACCESSION NUMBER OR OTHER EPA IDENTIFYING NUMBER
" 158.340	ACUTE TOXICOLOGY							
81-1	Acute oral LD-50, rat						Waiver	
81-2	Acute dermal LD-50						Waiver	
81-3	Acute inhalation LC-50, rat						Waiver	
81-4	Primary eye irritation rabbit						Waiver	
81-5	Primary dermal irritation						Waiver	
81-6	Dermal sensitization						Waiver	

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FORMULATOR'S EXEMPTION STATEMENT
(40 CFR 152.85)

EPA File Symbol/Reg. No. 4822-UVN

Product Name:

Applicant's Name and Address

S. C. Johnson & Son Inc.

1525 Howe St.

Racine, Wi. 53403

As an authorized representative of the applicant for registration of the product identified above, I hereby certify that:

(1) This product contains the active ingredient(s):

[REDACTED]

(2) Each active ingredient listed in paragraph (1) is present solely as the result of the incorporation into the product (during formulation or packaging) of another product which contains that active ingredient, which is registered under FIFRA sec. 3, and which is purchased by us from another producer.

(3) Indicate by circling (A) or (B) below which paragraph applies:

(A) An accurate Confidential Statement of Formula (EPA Form 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number and product name, the source of the active ingredient(s) listed in paragraph (1).

(or)

(B) The Confidential Statement of Formula dated _____ on file with the EPA is complete, current and accurate and contains the information required on the current CSF Form No. 8570-4. The registered source(s) of the active ingredient(s) listed in paragraph (1) is/are listed below:

Active ingredient

[REDACTED]

Source: Product name and Reg. No.

[REDACTED]

Signature

Gessie Z. Vander Beest

Date March 6, 1995

Title

Registration Specialist

EPA Form

(April 1985)

Product ingredient source information may be entitled to confidential treatment



S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-5011
Phone: (414) 631-2000

435742-01

VIA FEDERAL EXPRESS

March 6, 1995

Ms. Janet Andersen
Product Manager 90
U.S. Environmental Protection Agency
Office of Pesticide Programs
Document Processing Desk
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Dear Ms. Andersen:

APPLICATION

Re: OFF! Moth Proofer 5
EPA Reg. No. 4822-

Please find attached an Application for Pesticide Registration for OFF! Moth Proofer 5. [REDACTED] is a compounded lavender fragrance which contains oil of lavender, which is on the EPA approved inert list.

We understand that the EPA may eventually exempt oil of lavender from registration, but at the current time we need this registration to begin consumer testing of the product this season.

We are enclosing a product chemistry package for your review. We are requesting data waivers for all remaining data requirements based on the fact that this is a non-food use product. Criteria for waivers per 40 C.F.R. Part 158.45 are the non-toxic mode of pesticidal activity, negligible human and environmental exposure as a result of use as a pesticide and lack of adverse effects reports.

Product ingredient source information may be entitled to confidential treatment

March 6, 1995

Page 2

Our moth repellent dispenser dispenses, via membrane, only minute amounts of evaporative vapors of the moth repellent into the protective space. This substance poses little or no risk to human health or the environment. Exposure to non-pesticidal uses of these oils is generally greater than would be exposure to these substances when used in enclosed spaces as moth repellents. This product is very similar to our Glade Clip-On air freshener. See enclosed sample.

The precedent has been set by EPA in the registration of Moth-Away Herbal Moth Repellent, EPA Reg. No. 33112-1.

The perfume breakdown for [REDACTED] which we will be using will be sent to you via [REDACTED] as soon as we find out what our EPA file symbol will be for this product.

In summary, S. C. Johnson & Son, Inc. respectfully requests the EPA to waive all additional data requirements of 40 C.F.R. Part 158 in accordance with 40 C.F.R. Part 158.45.

Included with this submission are:

- Application for Pesticide Registration
- Confidential Statement of Formula
- Data Matrix
- Formulators Exemption
- Certification with Respect to Citation of Data
- 5 copies of draft labeling
- 3 copies of Chemistry Data

43574281

If you have any questions concerning this submission please call me at 414-631-3553.

Sincerely,

Geri L. Vander Leest

Geri L. Vander Leest
Registration Specialist

Enclosures

